

Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALEK SCHOTT, )  
Plaintiff, )  
v. ) Civil Action No.  
5:23-cv-00706-OLG-RBF  
JOEL BABB, in his individual )  
and official capacity; )  
MARTIN A. MOLINA III, in his )  
individual and official )  
capacity; JAVIER SALAZAR, )  
in his individual and )  
official capacity; and BEXAR )  
COUNTY, TEXAS, )  
Defendants. )

\*\*\*\*\*

ORAL DEPOSITION OF

KEVIN SHELDAHL

JANUARY 9, 2025

\*\*\*\*\*

ORAL DEPOSITION OF KEVIN SHELDAHL, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on January 9, 2025, from 9:32 a.m. to 4:42 p.m., before Donna Wright, CSR in and for the State of Texas, reported by machine shorthand, at the LAW OFFICES OF CHARLES S. FRIGERIO, 111 Soledad Street, Suite 465, San Antonio, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 Mr. Joshua A. Windham</p> <p>5 Mr. Joshua A. Fox</p> <p>6 INSTITUTE FOR JUSTICE</p> <p>7 901 North Glebe Road</p> <p>8 Suite 900</p> <p>9 Arlington, Virginia 22203</p> <p>10 (703) 682-9320</p> <p>11 chebert@ij.org</p> <p>12 jfox@ij.org</p> <p>13 -and-</p> <p>14 Ms. Christen M. Hebert</p> <p>15 INSTITUTE FOR JUSTICE</p> <p>16 816 Congress Avenue</p> <p>17 Suite 970</p> <p>18 Austin, Texas 78701</p> <p>19 (512) 480-5936</p> <p>20 chebert@ij.org</p> <p>21</p> <p>22 FOR THE DEFENDANT JOEL BABB:</p> <p>23 Mr. Stephen Barron (via Zoom)</p> <p>24 WRIGHT &amp; GREENHILL, P.C.</p> <p>25 4700 Mueller Boulevard</p> <p>Suite 200</p> <p>Austin, Texas 78723</p> <p>(512) 200-9697</p> <p>sbarron@w-g.com</p> <p>FOR THE DEFENDANTS MARTIN A. MOLINA III</p> <p>AND BEXAR COUNTY, TEXAS:</p> <p>Mr. Charles S. Frigerio</p> <p>Mr. Hector X. Saenz</p> <p>Mr. Charlie Frigerio</p> <p>LAW OFFICES OF CHARLES S. FRIGERIO</p> <p>111 Soledad Street</p> <p>Suite 840</p> <p>San Antonio, Texas 78205</p> <p>(210) 271-7877</p> <p>csfrigeriolaw@sbcglobal.net</p>	<p style="text-align: right;">Page 4</p> <p>1 KEVIN SHELDAHL,</p> <p>2 having been first duly sworn, testified as follows:</p> <p>3 EXAMINATION</p> <p>4 BY MR. WINDHAM:</p> <p>5 Q. Good morning, Mr. Sheldahl.</p> <p>6 A. Good morning.</p> <p>7 Q. We met a second ago. My name is Josh Windham.</p> <p>8 I represent Alek Schott, the plaintiff in this lawsuit.</p> <p>9 How are you doing today?</p> <p>10 A. Good.</p> <p>11 Q. Good. We're joined here in the room, just for</p> <p>12 the record by my colleagues, Christen Hebert and Josh</p> <p>13 Fox, by Deputy Babb's attorney, Stephen Barron, and by</p> <p>14 the county and Deputy Molina's attorneys, Charles</p> <p>15 Frigerio, Charlie Frigerio and Hector Saenz. Did I get</p> <p>16 all of that right?</p> <p>17 Okay. And the court reporter, Donna, is</p> <p>18 going to record our conversation today. Does that make</p> <p>19 sense?</p> <p>20 A. Yes.</p> <p>21 Q. Great. And just as a matter of procedure, do</p> <p>22 you agree that by being here, you don't have any issues</p> <p>23 with the deposition notice you received or with Donna's</p> <p>24 qualifications to be a court reporter?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 Appearances..... 2</p> <p>3</p> <p>4 KEVIN SHELDAHL</p> <p>5</p> <p>6 Examination by Mr. Windham..... 4</p> <p>7</p> <p>8 Witness' Signature Page..... 286</p> <p>9 Reporter's Certificate..... 288</p> <p>10</p> <p>11 EXHIBITS</p> <p>12 NUMBER DESCRIPTION PAGE</p> <p>13 Exhibit 105 ..... 15</p> <p>14 Sheldahl Report</p> <p>15 Exhibit 106 ..... 143</p> <p>16 K9 Detector Dog Training Course</p> <p>17 Exhibit 107 ..... 239</p> <p>18 Exhibit 108 ..... 248</p> <p>19 Molina K9 Detail Reports</p> <p>20 5/12/21 through 3/16/22</p> <p>21 Exhibit 109 ..... 279</p> <p>22 Excel Spreadsheets</p> <p>23</p> <p>24 PREVIOUSLY MARKED EXHIBITS</p> <p>25 NUMBER PAGE</p> <p>Exhibit 26 ..... 204</p> <p>Exhibit 30 ..... 206</p> <p>Exhibit 32 ..... 177</p>	<p style="text-align: right;">Page 5</p> <p>1 Q. Great. And to kick us off, would you give us</p> <p>2 your full name and your job title today?</p> <p>3 A. Kevin Robert Sheldahl. Job title,</p> <p>4 self-employed, I guess.</p> <p>5 Q. Good for you. And is there a title you want</p> <p>6 me to use for you today, just as a matter of -- I know</p> <p>7 you were in law enforcement.</p> <p>8 A. Kevin is fine.</p> <p>9 Q. Okay. I'm probably not going to call you</p> <p>10 Kevin.</p> <p>11 A. Okay.</p> <p>12 Q. You know, I was raised in the south, so</p> <p>13 Mr. Sheldahl is going to be the way I address you.</p> <p>14 Have you been deposed before?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. How many times?</p> <p>17 A. Four.</p> <p>18 Q. Four, okay. I'll come back to that later.</p> <p>19 So you have a general understanding of</p> <p>20 kind of the way depositions work?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Okay. Just, I guess, a quick refresher.</p> <p>23 You're testifying under oath as if you were in a</p> <p>24 courtroom.</p> <p>25 Do you understand that?</p>

<p style="text-align: right;">Page 6</p> <p>1 A. Yes.</p> <p>2 Q. And if I ask a question, please give me your</p> <p>3 answer, the court reporter is going to record that.</p> <p>4 Does that make sense?</p> <p>5 A. Yes.</p> <p>6 Q. Speak clearly, give clear answers for the</p> <p>7 court reporter and let's try not to speak over each</p> <p>8 other, if that makes sense.</p> <p>9 A. It does.</p> <p>10 Q. I know it's hard sometimes to do that.</p> <p>11 If I ask you a question, please try to</p> <p>12 let me finish and I'll give you the same courtesy when</p> <p>13 you're answering. Okay?</p> <p>14 A. Thank you.</p> <p>15 Q. Cool. I might show you some documents today.</p> <p>16 You have every right to review the document in full or</p> <p>17 the video in full, if I show a video, before answering</p> <p>18 questions if you want to do that. Okay?</p> <p>19 A. Yes.</p> <p>20 Q. Great. And if I ask a question that's</p> <p>21 unclear, if I speak too fast, just let me know, I'll</p> <p>22 repeat myself or try another way, if that makes sense.</p> <p>23 A. Okay.</p> <p>24 Q. Great. Mr. Frigerio may object to a question</p> <p>25 at some point, Mr. Barron may object to a question at</p>	<p style="text-align: right;">Page 8</p> <p>1 Mr. Frigerio, before today?</p> <p>2 A. No.</p> <p>3 Q. Okay. And since I mentioned the report, you</p> <p>4 have been asked to produce a report in this case,</p> <p>5 right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Tell me how you came about writing that</p> <p>8 report. How did you come to write it?</p> <p>9 A. I was asked to.</p> <p>10 Q. That makes sense. I assume Mr. Frigerio asked</p> <p>11 you to do that?</p> <p>12 A. Yes.</p> <p>13 Q. What was your understanding of the assignment?</p> <p>14 A. To give my opinions on a narcotics K9</p> <p>15 deployment.</p> <p>16 Q. Okay. Anything else?</p> <p>17 A. That was the focus.</p> <p>18 Q. Okay. So the focus of the report you were</p> <p>19 asked to write was on the narcotics K9 deployment in</p> <p>20 this case?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay.</p> <p>23 A. Deputy Molina's actions with his police</p> <p>24 service dog.</p> <p>25 Q. Okay. Did you understand the assignment to be</p>
<p style="text-align: right;">Page 7</p> <p>1 some point. Please answer unless you're instructed not</p> <p>2 to. Okay?</p> <p>3 A. Okay.</p> <p>4 Q. And I think, most importantly, let me know if</p> <p>5 you get tired, need a break, need to go to the</p> <p>6 bathroom, that kind of thing.</p> <p>7 A. I will do that.</p> <p>8 Q. Great. All right. Is there any reason that</p> <p>9 you can't testify truthfully today, like you're on an</p> <p>10 impairing medication?</p> <p>11 A. No.</p> <p>12 Q. Okay. Is there anything you did to prepare</p> <p>13 for today's deposition?</p> <p>14 A. I reviewed the information that I was provided</p> <p>15 by Dropbox --</p> <p>16 Q. Okay.</p> <p>17 A. -- that pertained to the case.</p> <p>18 Q. Is that the information -- we will get into</p> <p>19 this a little later. Is that the information on which</p> <p>20 you relied in writing your report?</p> <p>21 A. Yes, it is.</p> <p>22 Q. Okay. And so if I wanted to see that</p> <p>23 information, it would be what's listed in your report?</p> <p>24 A. Yes.</p> <p>25 Q. Got it. Did you talk to anybody, other than</p>	<p style="text-align: right;">Page 9</p> <p>1 opining at all about the conduct of other officers on</p> <p>2 the scene?</p> <p>3 A. No.</p> <p>4 Q. Okay. What about the conduct of the county</p> <p>5 itself, more broadly?</p> <p>6 A. No.</p> <p>7 Q. So just Deputy Molina and K9 Max?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Tell me how you went through writing</p> <p>10 the report. Tell me, I guess -- let me scratch that</p> <p>11 question.</p> <p>12 How did you go about writing the report?</p> <p>13 A. I reviewed the information I was provided,</p> <p>14 made myself a rough draft and then produced it.</p> <p>15 Q. Okay. About how long did it take you to</p> <p>16 review the documents you were provided?</p> <p>17 A. I don't recall.</p> <p>18 Q. Would it have been more than 30 minutes?</p> <p>19 A. Oh, yes.</p> <p>20 Q. Okay. Would it have been more than ten hours?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. More than 20 hours?</p> <p>23 A. Yeah. I think total, when you're reading and</p> <p>24 pondering over it, yeah, more than 20 hours.</p> <p>25 Q. So you said you couldn't give me a guess, but</p>

<p style="text-align: right;">Page 10</p> <p>1 I'm going to keep doing this until we got a rough 2 approximation, unless you can give me one. 3 A. Beyond that -- it's more than 20, but I 4 couldn't give you any kind of an idea past that. 5 Q. 20 to 30 hours, maybe? 6 A. Yeah. I don't know how often it popped into 7 my head. 8 Q. That's totally fine. And then in writing the 9 actual report itself, you mentioned you wrote a draft. 10 How long did that take? 11 A. The draft itself probably only took me a 12 couple hours. 13 Q. Okay. Did you produce anything, based on your 14 review of the documents you received, other than the 15 draft report and the final report? 16 A. No. 17 Q. So you didn't produce any notes or charts or 18 anything like that? 19 A. No. 20 Q. Okay. And you mentioned you've been deposed 21 four times, right? 22 A. Yes. 23 Q. Can you give me a brief sketch of what those 24 cases were about, if you remember? 25 A. Yeah, I was deposed over a dog bite in July.</p>	<p style="text-align: right;">Page 12</p> <p>1 And so he was the plaintiff. 2 Q. Okay. So was K9 Services the defendant? 3 A. Yes. 4 Q. Is that lawsuit resolved? 5 A. No. 6 Q. Okay, it's still pending. Do you know what 7 stage it's at? 8 A. I couldn't tell you exactly. We do have a 9 trial set for November. 10 Q. Okay, got it. What about the 2002 11 apprehension, you said? 12 A. Yes. 13 Q. Tell me what that was about. 14 A. I utilized the dog on a suspect from an armed 15 encounter in the south valley of Albuquerque who had 16 fled, had a high speed pursuit afterwards and he hid 17 underneath an old trailer and I used the dog to help 18 extract him. 19 Q. Okay. So just to see if I have this right, 20 were you testifying in your capacity as the handler who 21 was there? 22 A. Yes. 23 Q. So you weren't testifying as an expert in K9 24 matters at that time? 25 A. Correct.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. July of this year? 2 A. Yes. 3 Q. Well, I guess that would have been 2024. 4 A. Yeah, we're in the new year. I was deposed 5 over an apprehension in 2002. I was deposed about a 6 SWAT activation, I don't recall, in the '90s. And I 7 was deposed over an accident I witnessed back in the 8 very early -- early '90s, I think. 9 Q. Okay. So the first three you mentioned, not 10 the accident, but the first three, were those in your 11 capacity as a K9 expert? 12 A. No. 13 Q. Okay. Let me walk through them a little bit. 14 So the July 2024 dog bite deposition, what capacity 15 were you testifying in there? 16 A. For my business. 17 Q. Okay. And what's the name of the business? 18 A. K9 Services. 19 Q. Just give me a little indication what that was 20 about. 21 A. An officer from a department in New Mexico was 22 asked to do -- to help in a demonstration and a K9 23 handler that had been through one of my classes a 24 couple years prior deployed his dog on him and, at the 25 end of the day, the kid fell down, got bit in the face.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. And what about the SWAT incident in the '90s? 2 A. Yeah, that was -- I can't remember the name of 3 it. It was -- I was kind of "et al" in the lawsuit, 4 and so I had a brief deposition over that. 5 Q. You were a defendant? 6 A. Yeah. 7 Q. Okay. 8 A. Just me and probably 30 other people. 9 Q. Okay. How was that one resolved? 10 A. Oh, it was dismissed, ultimately. 11 Q. Okay. And then the accident, I assume the 12 fourth deposition you mentioned, you were just a 13 witness? 14 A. Yeah, I just happened to roll up on it. 15 Q. Okay. 16 A. And, yeah, it was -- I just happened to be 17 there. 18 Q. Okay. So none of the depositions that we just 19 talked about involved you testifying as a K9 expert, 20 right? 21 A. No. 22 Q. Have you ever testified as a K9 expert prior 23 to this case? 24 A. Yes. 25 Q. How many times?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. In federal court in New Mexico over a 2 narcotics dog deployment, it was a suppression hearing 3 during the proceeding. I have done that in the state 4 of Wisconsin and I have done it in the state of 5 New Mexico. 6 Q. So if I'm repeating what you're saying, it's 7 just because I want to make sure I understand. 8 So it sounds like you've testified as an 9 expert in three cases involving a narcotics dog 10 deployment; is that fair? 11 A. That's correct. 12 Q. And those were all criminal cases? 13 A. Yes. 14 Q. Suppression cases? 15 A. Yes. 16 Q. Okay. In any of those cases, was your 17 testimony limited or excluded? 18 A. No. 19 Q. In any of those cases -- well, actually, were 20 you on the defense side in all of those cases or the 21 government side? 22 A. The government side. 23 Q. All right. So let's take a look at your 24 report. I'm going to introduce what has been marked as 25 Exhibit 105. And Mr. Fox is going to hand folks a copy</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes, correct. 2 Q. So this document, Exhibit 105, is your expert 3 report, resume and your fee schedule, right? 4 A. Correct. 5 Q. And just to clarify something I was a little 6 confused about, the first paragraph on page 1, under 7 the heading "Dear Mr. Charles Frigerio." 8 A. Yes. 9 Q. I want to ask you about the text after the 10 semicolon, so I'll just read it out loud so you know 11 where I am. "Specifically, the issues related to the 12 probable cause use of force in the deployment of a 13 police service dog handled by Santa Maria Police 14 Department officer Christopher Green and Sergeant 15 Woodrow Vega's role in the underlying SWAT operation." 16 Did I read that -- 17 A. Sorry, I did a cut and paste and forgot to 18 edit it. 19 Q. That's okay. Honestly, I just wanted to 20 clarify what was going on. 21 A. Yeah, that should be not there. 22 Q. Okay. So -- 23 A. I didn't realize I hadn't saved my changes. 24 Q. It's not a big deal. I mostly just wanted to 25 understand. So what's going on here is that -- do you</p>
<p style="text-align: right;">Page 15</p> <p>1 of that. 2 (Exhibit 105 marked) 3 MR. WINDHAM: Hey, Stephen, do you need 4 us to send you these as we go? 5 MR. BARRON: No. Since I'm just here on 6 my computer, I can actually keep up pretty quick. 7 MR. WINDHAM: Okay. Let us know if you 8 need help. 9 MR. BARRON: Appreciate it. 10 Q. (BY MR. WINDHAM) So I'm handing you what's 11 been marked as Exhibit 105. Just while we hand out 12 other copies, take a moment to look through and let me 13 know when you're ready to talk about it. 14 A. I'm ready. 15 Q. All right. So just to start things off, have 16 you seen this document before? 17 A. Yes. 18 Q. What is it? 19 A. It's my expert report. 20 Q. Okay. And just to kind of speed this up a 21 little bit, turn past page 19 for me. And what is 22 after page 19? I think that's your resume, right? 23 A. Correct. 24 Q. Then the very last page there is your fee 25 schedule, right?</p>	<p style="text-align: right;">Page 17</p> <p>1 have kind of like a template that you use for expert 2 reports? 3 A. Absolutely. 4 Q. So you just didn't change the text there? 5 A. Well, I did. I didn't save it. 6 Q. Well, I guess that raises a question in my 7 mind. Is there another version of this out there 8 somewhere that you meant to submit? 9 A. No. 10 Q. Okay. 11 A. It just didn't save. 12 Q. Okay. So that's just the one change that 13 didn't save? 14 A. Yeah. 15 Q. Do you stand by the rest of the report, as we 16 sit here today? 17 A. Unless we find something else that I did like 18 that, I do. 19 Q. Okay, that's fine. And you can point it out 20 to me as we go through if there's something like that 21 in there. So I guess, just to kind of clarify, then, 22 this -- this is saying that your report is about this 23 other incident involving a SWAT operation. 24 What is your report actually about? 25 A. It's about Deputy Molina's deployment of his</p>

<p style="text-align: right;">Page 18</p> <p>1 narcotics detector dog.</p> <p>2 Q. Okay. On the March 16th, 2022 incident</p> <p>3 involving Alek Schott?</p> <p>4 A. Correct.</p> <p>5 Q. Okay, great. So let's just go through the</p> <p>6 basic structure and content of the report. It looks</p> <p>7 like if we turn to pages 5 through 9, you have offered</p> <p>8 six opinions; is that right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And are those six opinions the only</p> <p>11 opinions you intend to offer in this case?</p> <p>12 A. Unless I get other information.</p> <p>13 Q. Sure. But sitting here today, you have no</p> <p>14 intent to offer other opinions?</p> <p>15 A. No.</p> <p>16 Q. Okay. And those six opinions, as we</p> <p>17 discussed, are, in your mind, focused on Deputy Molina</p> <p>18 and K9 Max's conduct?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. Why did you decide to offer these six</p> <p>21 opinions?</p> <p>22 A. Based on the information that I was provided.</p> <p>23 Q. So I guess one way to think about that might</p> <p>24 be you looked at the information you received from</p> <p>25 Mr. Frigerio and didn't feel that you wanted to provide</p>	<p style="text-align: right;">Page 20</p> <p>1 about the actions of Deputy J. Babb and his conclusions</p> <p>2 during the traffic stop, that warrants review."</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Just -- so I think we have gotten this,</p> <p>6 but I want to make sure I'm clear on this. There's a</p> <p>7 lot of references throughout the opinions that you have</p> <p>8 offered to Deputy Babb. Are those just there as kind</p> <p>9 of passing context for your opinions about Deputy</p> <p>10 Molina and Max?</p> <p>11 A. They are there because that is the catalyst</p> <p>12 that brought him there.</p> <p>13 Q. Okay. But the opinions you're offering as an</p> <p>14 expert are not about those people and their conduct.</p> <p>15 They are just about Deputy Molina and K9 Max?</p> <p>16 A. They are just about why he was requested</p> <p>17 there.</p> <p>18 Q. Well, they are just about why he was requested</p> <p>19 there?</p> <p>20 A. The reference to Babb --</p> <p>21 Q. Got it.</p> <p>22 A. -- was the reason that Molina even appeared on</p> <p>23 the scene.</p> <p>24 Q. Okay. So referencing Babb is just a way of</p> <p>25 explaining why you're talking about Deputy Molina?</p>
<p style="text-align: right;">Page 19</p> <p>1 other opinions or could provide other opinions?</p> <p>2 A. Based on what I saw, I thought these were the</p> <p>3 pertinent opinions.</p> <p>4 Q. Okay. Would you be uncomfortable offering</p> <p>5 opinions about other matters based on the information</p> <p>6 you received, aside from these six?</p> <p>7 A. My focus was purely on Deputy Molina and K9</p> <p>8 Max.</p> <p>9 Q. Okay. Did you feel that you had the ability</p> <p>10 to offer other opinions on what Deputy Molina and K9</p> <p>11 Max did, aside from these six?</p> <p>12 A. Based on other questions, possibly.</p> <p>13 Q. Yeah. I guess what I'm trying to understand</p> <p>14 is whether you felt like the information you had</p> <p>15 received would have justified you or given you a basis</p> <p>16 for offering other opinions that you didn't give us.</p> <p>17 A. I'm not sure that I can answer that unless</p> <p>18 other questions come up.</p> <p>19 Q. Okay. And maybe they will today.</p> <p>20 A. Okay.</p> <p>21 Q. Maybe they will today. Just to clarify</p> <p>22 something -- well, actually, let me -- there is --</p> <p>23 there is some commentary in some of these opinions on</p> <p>24 Deputy Babb. So if you turn to page -- let's see here,</p> <p>25 page 6 at the bottom, "Although this report is not</p>	<p style="text-align: right;">Page 21</p> <p>1 A. It gives context to the deployment.</p> <p>2 Q. Understood. Got it. Okay. So -- and still</p> <p>3 on page 5, it looks like at the bottom there, under</p> <p>4 professional opinions, there's a line that says, "My</p> <p>5 professional and expert opinions are based on the</p> <p>6 information I received, as well as on my training,</p> <p>7 experience, expertise, education and familiarity with</p> <p>8 professional publications."</p> <p>9 Did I get that right?</p> <p>10 A. Correct.</p> <p>11 Q. So I wanted to break that down a little bit</p> <p>12 because there's kind of a lot there.</p> <p>13 Before I do that, though, is there</p> <p>14 anything else, aside from this list, that you relied on</p> <p>15 when forming your opinions?</p> <p>16 A. No.</p> <p>17 Q. Okay. So let's start with the information you</p> <p>18 received, which is something you mentioned there at the</p> <p>19 bottom of page 5, and turn to page 3 for me. And under</p> <p>20 section 2, there's a list of 16 items.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. So are these 16 items the entirety of</p> <p>24 the information you received via Dropbox from</p> <p>25 Mr. Frigerio?</p>



<p style="text-align: right;">Page 22</p> <p>1 A. I think some of the headings cover more than a 2 single item.</p> <p>3 Q. Okay. I might ask you about a few of those. 4 Let's just start with the first paragraph there above 5 the list. So I see a sentence that says, "The 6 foregoing list --" I assume that means the following 7 list, right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. "The following list underscores those 10 records to which I devoted substantial consideration." 11 Did I read that right?</p> <p>12 A. Yes.</p> <p>13 Q. And what is substantial consideration?</p> <p>14 A. That was my focus.</p> <p>15 Q. Okay. I just want to understand what it 16 means, in your mind, to have considered something 17 substantially.</p> <p>18 A. Substantially just means that's the focus. 19 That's what I was relying on, that's what I was 20 provided and that's what I focused my attention on.</p> <p>21 Q. Is it fair to say that substantial 22 consideration involves reviewing something in detail 23 thoroughly?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And so if an item is not listed here in</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I think I received them from Mr. Frigerio 2 through a Dropbox.</p> <p>3 Q. Okay, that's fine. So you would have reviewed 4 the videos that were linked in the complaint, just not 5 by clicking the links?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. What about No. 2 there, Bexar County 8 Sheriff's Department K9 policy, I think that's pretty 9 self-explanatory, but are you talking about the policy 10 that Bexar County has adopted in writing?</p> <p>11 A. The one that I was provided, yes.</p> <p>12 Q. Okay. No. 3, Bexar County dispatch logs. I 13 don't know what that means, so I thought I would you 14 ask you.</p> <p>15 A. Well, there's different vocabulary for these, 16 but the computer-aided dispatch logs provide the 17 timestamps on things like dispatch and the time of a 18 traffic stop, and I received those.</p> <p>19 Q. Okay. When you say "those," I mean, Bexar 20 County dispatch logs as phrased is like super broad. 21 I'm imagining thousands and thousands of logs.</p> <p>22 A. Just as it pertained to this incident.</p> <p>23 Q. Okay. So you reviewed the -- I guess the CAD 24 log --</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 this list of 16, with the caveat that a heading might 2 contain other items under it, it's not an item to which 3 you devoted substantial consideration?</p> <p>4 A. I think we would have to look at the 5 individual item and see if it fit.</p> <p>6 Q. Okay, that's fair. So if I ask you about an 7 item, we can kind of assess whether it falls in this 8 list?</p> <p>9 A. Correct.</p> <p>10 Q. Got it. So let's maybe go through it, then. 11 There's a reference, point one, to the complaint. I 12 assume you're talking about the complaint that 13 initiated this lawsuit?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. There are links to videos in that 16 complaint.</p> <p>17 Do you remember that?</p> <p>18 A. Yes. None of them worked for me.</p> <p>19 Q. None of them worked for you? Okay. So you 20 clicked the links in the -- in the complaint and they 21 didn't work for you?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. So to the extent that there were videos 24 attached to the complaint via links, you didn't look at 25 those?</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. -- for this incident, right?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. So that would have been one document, 4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. What about No. 4, NCATS audit videos of K9 Max 7 handled by Deputy Molina.</p> <p>8 Did that consist entirely of videos?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Do you have a sense of how many videos 11 you reviewed for that?</p> <p>12 A. I would have to go back and count. There was 13 two years worth and they covered their buildings and 14 vehicle sniffs.</p> <p>15 Q. Okay. And so those were the videos that would 16 have been submitted to NCATS for certification?</p> <p>17 A. That's my understanding.</p> <p>18 Q. Okay, got it. And all of this is in a Dropbox 19 folder somewhere, right?</p> <p>20 A. Yes.</p> <p>21 Q. The materials that you reviewed and that were 22 provided to you?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. There's a reference -- I guess No. 5 is 25 missing. I just realized that. So we're talking about</p>

<p style="text-align: right;">Page 26</p> <p>1 15 items instead of 16 items. Is that fair to say?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. Well, reports from this incident, there were</p> <p>5 several.</p> <p>6 Q. Well, no, I guess what I'm getting at is under</p> <p>7 section 2, there's a list that goes from one to 16, but</p> <p>8 No. 5 is missing, right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. So No. 6, what is reports from this</p> <p>11 incident?</p> <p>12 A. I received multiple reports that included --</p> <p>13 looks like some deployment logs, it included some</p> <p>14 reports that were produced by Babb and Molina of</p> <p>15 different -- different sorts. It's a different way</p> <p>16 than I did business when I was working. We would have</p> <p>17 produced a different report, but the same information.</p> <p>18 And also reports from -- some reviews by supervision.</p> <p>19 Q. Okay. Just to walk through that a little bit,</p> <p>20 are you talking about -- I'm familiar with a document</p> <p>21 called an SPEARS summary. Is that what you're talking</p> <p>22 about there with the reports from this incident?</p> <p>23 A. SPEARS is not a term that I have ever used in</p> <p>24 my career.</p> <p>25 Q. Okay. Was it the title of the document that</p>	<p style="text-align: right;">Page 28</p> <p>1 Babb?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Any other internal affairs reports that</p> <p>4 you reviewed?</p> <p>5 A. No.</p> <p>6 Q. Okay. Let's see. There's a reference to</p> <p>7 No. 8, training records for Deputy Molina. Tell me</p> <p>8 about that.</p> <p>9 A. They have a form that is filled out for</p> <p>10 returning and a form for deployment and I was provided</p> <p>11 with a number of those.</p> <p>12 Q. Okay. Do you have a sense of how many you</p> <p>13 were provided?</p> <p>14 A. A lot.</p> <p>15 Q. Okay. Would it have been for a one-year</p> <p>16 period, a two-year period? Give me a sense of the date</p> <p>17 range.</p> <p>18 A. It was longer than that, I believe.</p> <p>19 Q. Okay. Did you have a sense that it was the</p> <p>20 entirety of Deputy Molina's career as a handler?</p> <p>21 A. It appeared so.</p> <p>22 Q. Okay. And then what about training and</p> <p>23 deployment records for K9 Max? Go ahead.</p> <p>24 A. They were kind of one and the same.</p> <p>25 Q. Got it. So to the extent that Deputy Molina</p>
<p style="text-align: right;">Page 27</p> <p>1 you looked at, though?</p> <p>2 A. That seems to be one of them.</p> <p>3 Q. Okay.</p> <p>4 A. But it's not something that I'm familiar with.</p> <p>5 Q. Okay. And these are the -- when we're talking</p> <p>6 about No. 6, reports from this incident, we're just</p> <p>7 talking about like narrative summaries from the</p> <p>8 officers of this incident?</p> <p>9 A. Correct.</p> <p>10 Q. So that would have been Deputy Molina, Deputy</p> <p>11 Garrob and Deputy -- former Deputy Babb?</p> <p>12 A. Correct.</p> <p>13 Q. Any other officers whose reports you reviewed</p> <p>14 regarding this incident?</p> <p>15 A. No.</p> <p>16 Q. And you mentioned some other report that I</p> <p>17 didn't quite catch what you said there at the end?</p> <p>18 A. I recall looking at what -- maybe they were</p> <p>19 internal affairs --</p> <p>20 Q. Okay.</p> <p>21 A. -- professional standards, whatever that</p> <p>22 department calls it, reports that were also provided to</p> <p>23 me.</p> <p>24 Q. Okay. Just to see if I can nail that down,</p> <p>25 did you review an internal affairs report on Deputy</p>	<p style="text-align: right;">Page 29</p> <p>1 has been a handler of Max at the Bexar County Sheriff's</p> <p>2 Office, your understanding is you looked at all of the</p> <p>3 training records and all of the deployment records for</p> <p>4 them?</p> <p>5 A. Yes.</p> <p>6 Q. Got it. I'll skip over a couple of these.</p> <p>7 No. 13 there -- actually, sorry, 12, general and</p> <p>8 supplemental reports and there is a case code there, I</p> <p>9 think.</p> <p>10 A. Uh-huh.</p> <p>11 Q. I don't -- what is that?</p> <p>12 A. I have to -- I would have to go back and look.</p> <p>13 Q. Okay.</p> <p>14 A. I think it might -- I could have lumped that</p> <p>15 up into --</p> <p>16 Q. No. 6?</p> <p>17 A. -- No. 6.</p> <p>18 Q. Okay, possibly. What about No. 13, deposition</p> <p>19 of Deputy Molina, how many deposition transcripts did</p> <p>20 you review?</p> <p>21 A. Initially one, and yesterday, a second one.</p> <p>22 Q. Okay. So after you wrote this report, you</p> <p>23 reviewed a second transcript from Deputy Molina?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. Did anything you reviewed in the second</p>



<p style="text-align: right;">Page 30</p> <p>1 transcript give you cause to question or change your 2 opinions in this report? 3 A. No. 4 Q. Okay. What about any exhibits that might have 5 been introduced during either the first or the 6 continued deposition of Deputy Molina? Did you look at 7 those exhibits? 8 A. From the continued one, no. 9 Q. Okay. From the first one you did, though? 10 A. Whatever I was supplied, I looked at. I would 11 have to look at that specifically. 12 Q. Okay. But if -- 13 A. But I believe so. 14 Q. If you received exhibits, they would have been 15 in the Dropbox folder we've been talking about? 16 A. I believe so. 17 Q. Okay. Let's see here. Body-worn camera from 18 Deputy Babb, No. 15 -- and I'll just ask about these 19 together -- body-worn camera video from -- sorry, 20 body-worn camera video from Deputy Molina, No. 16, how 21 many videos did you review? 22 A. There was a video from Babb where he set his 23 camera on the dash. I saw a video that was from the 24 plaintiff's vehicle and -- 25 Q. Just one video?</p>	<p style="text-align: right;">Page 32</p> <p>1 substantial consideration to in writing this report? 2 A. I don't believe so. 3 Q. Okay, thank you. Let's move on to the next 4 category that you listed in the last paragraph -- 5 paragraph on page 3. So we talked about the fact -- 6 I'm sorry, I think I have that wrong. The last 7 paragraph on page 5. So we have talked about the fact 8 that you relied on information you reviewed and we have 9 discussed that. You mentioned relying on your 10 training, experience and education, right? 11 A. Correct. 12 Q. Okay. So let's get into that a little bit, 13 and I think we can kind of expedite that a fair amount. 14 You cover a lot of your training, experience and 15 expertise and education on pages 1 to 2, right, of your 16 report? 17 A. Yes, there's a summary on page 1 and 2. 18 Q. Do you -- well, I guess what I'm wondering is 19 do you feel that -- this is mostly to streamline my 20 questions. 21 Do you feel that the summary you provide 22 on pages 1 to 2 is the part of your training, 23 experience and education that is the most pertinent to 24 this case? 25 A. I think it summarizes my career as a K9</p>
<p style="text-align: right;">Page 31</p> <p>1 A. I think it was just one. 2 Q. Okay. 3 A. It was just one. And then video -- and then 4 video from Deputy Molina from the time he arrived. 5 Q. Okay, got it. So that sounds like three 6 videos. Is that fair? 7 A. There might have been more. I don't know if 8 they were given in different portions so my perception 9 would have been more. I don't recall. 10 Q. Okay. Did you receive anything else that we 11 haven't talked about from Mr. Frigerio yesterday? 12 A. No. 13 Q. So just that second -- 14 A. That was quite enough. 15 Q. Okay. Well, I guess -- I think the question 16 might be unclear on the record, so let's ask it two 17 ways. 18 The first question is, did you receive 19 anything after writing this report from Mr. Frigerio, 20 aside from that second transcript from Deputy Molina? 21 A. No. 22 Q. Okay. And then just to kind of capstone all 23 of this, we have talked about a number of documents 24 just now discussing section 2 of your report. Is there 25 anything else we haven't talked about that you gave</p>	<p style="text-align: right;">Page 33</p> <p>1 handling instructor is what it does. 2 Q. Okay. 3 A. I'm not -- there's a lot of it. 4 Q. Yeah. 5 A. So to say that it's just those things, I don't 6 know. 7 Q. Okay. 8 A. It would be hard to say that. 9 Q. Well, let's do it this way. You have a resume 10 you have attached as well, right? We talked about that 11 earlier? 12 A. Correct. 13 Q. Is there anything aside from the summary you 14 have provided on pages 1 to 2 of your report and what's 15 discussed in your resume that you would have relied on 16 in writing this report? 17 A. And my experience, and every bit of my 18 experience is not listed in my resume. 19 Q. Well, that -- I mean, I -- 20 A. I spent 22 years on the road. 21 Q. No, I understand. I'm mostly trying to make 22 sure I'm not surprised by something that's not in here. 23 A. Okay. 24 Q. So let me ask it this way. Do you feel that 25 there is any training, experience or education that you</p>

<p style="text-align: right;">Page 34</p> <p>1 have that you would have relied on when writing this  2 report that is not listed somewhere here?  3 A. Yeah, I can't -- I can't list my entire  4 experience.  5 Q. Well, I mean, let me --  6 A. That's a difficult question to answer and try  7 to make concrete.  8 Q. Let's give an example. So on page 2,  9 paragraph 2, you have a reference to working in the  10 Bernalillo County --  11 A. Bernalillo.  12 Q. Okay, Bernalillo County Sheriff's Department  13 in 1992 and retiring in 2014, right?  14 A. Correct.  15 Q. And I assume you spent that time as a K9  16 handler?  17 A. All but eight months.  18 Q. All but eight months, okay. So I'm not trying  19 to do a gotcha and say you didn't list out every single  20 thing you did there. I understand that a reference to  21 your time working in law enforcement for a range is --  22 would include all of your experience in that range. Is  23 that fair?  24 A. That's fair.  25 Q. Okay. So let me just ask my question again</p>	<p style="text-align: right;">Page 36</p> <p>1 A. No.  2 Q. Okay. Are there any types of trainings that  3 you've offered that you feel are important to the  4 opinions that you've offered in this report that are  5 not listed here?  6 A. I think everything is listed that -- I think.  7 To the best of my knowledge, everything is listed in  8 here somewhere.  9 Q. That you would have relied on when writing  10 this report?  11 A. Yes.  12 Q. Thank you.  13 Okay. So I wanted to ask you about -- on  14 page 2, there's just a few references I wanted to kind  15 of explore a little bit. So paragraph 3 -- let me know  16 when you're there. I don't mean to rush you.  17 A. I'm there.  18 Q. Okay. I don't think you are, actually. Page  19 2.  20 A. Oh, page 2.  21 Q. So page 2, paragraph 3, and it's the last  22 sentence in that paragraph. And it reads, "I was  23 responsible --" this is during your law enforcement  24 career. "I was responsible for the curriculum for  25 training handlers, weekly maintenance training,</p>
<p style="text-align: right;">Page 35</p> <p>1 because I'm not trying do a gotcha.  2 MR. FRIGERIO: I'm not sure that Stephen  3 is on.  4 MS. HEBERT: Stephen, are you here?  5 MR. WINDHAM: We can take a pause while  6 we figure out the tech.  7 MR. FRIGERIO: I didn't see his picture.  8 Thanks, Charles.  9 MS. HEBERT: Yeah, his picture fell off.  10 We'll have to see if he can get back in.  11 MR. WINDHAM: We can go off the record.  12 THE REPORTER: Okay.  13 (Discussion off the record)  14 Q. (BY MR. WINDHAM) So we're back on the record  15 after a brief delay. Do you understand you are still  16 under oath?  17 A. Yes.  18 Q. Okay. Let me try this way. Are there any  19 jobs that you have held that you feel bear on the  20 opinions that you have written in -- here in this  21 report that are not listed in your report or resume?  22 A. No, I don't think there are.  23 Q. Okay. Are there any degrees you've received  24 that you feel are pertinent to these opinions that are  25 not listed?</p>	<p style="text-align: right;">Page 37</p> <p>1 remediation of K9 teams and producing advanced training  2 and tactics detection in SWAT integration."  3 Did I get that right?  4 A. That's correct.  5 Q. Okay. How many years did you spend in a  6 position where you were responsible for the curriculum  7 for training handlers, weekly maintenance training and  8 remediation of K9 teams?  9 A. In my position as a sworn deputy, it was  10 22 years.  11 Q. Okay. And then have you been doing that since  12 then?  13 A. Yes. I'm currently on contract with  14 Bernalillo County Sheriff's Department to do the same  15 things.  16 THE REPORTER: Which one?  17 THE WITNESS: Bernalillo County,  18 B-E-R-N-A --  19 THE REPORTER: Yeah, I know.  20 THE WITNESS: Okay.  21 Q. (BY MR. WINDHAM) And would that be with your  22 company, K9 Services?  23 A. Yes.  24 Q. Okay. And I assume K9 Services provides the  25 same kind of services for other law enforcement</p>

<p style="text-align: right;">Page 38</p> <p>1 entities?</p> <p>2 A. This is the only one that I'm under contract</p> <p>3 to do weekly training.</p> <p>4 Q. Okay.</p> <p>5 A. It would be too cumbersome to do more.</p> <p>6 Q. Got it. I mean, how much time are you</p> <p>7 spending weekly on that?</p> <p>8 A. Anywhere from -- depending on the week,</p> <p>9 anywhere from six to sometimes 60 hours.</p> <p>10 Q. Okay, so that's pretty close to a full-time</p> <p>11 job there.</p> <p>12 A. Yes.</p> <p>13 Q. Setting aside that work, I assume K9 -- K9</p> <p>14 Services, rather, your company, is offering these</p> <p>15 services in other ways, right?</p> <p>16 A. I do workshops, seminars, basic K9 handler</p> <p>17 courses and instructor courses.</p> <p>18 Q. And through your sworn law enforcement career</p> <p>19 and then in your capacity as a private citizen offering</p> <p>20 consulting services and contracting services, how many</p> <p>21 K9 teams would you estimate that you have trained?</p> <p>22 A. I'm going to estimate over 400.</p> <p>23 Q. Okay, so about over 400 -- I'm not going to</p> <p>24 hold you to a specific number -- K9 teams that you have</p> <p>25 trained. And then you also offer a certification,</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Okay. I mean, it sounds to me like you have a</p> <p>2 very extensive career in K9 handling and training; is</p> <p>3 that fair?</p> <p>4 A. That's a fair assessment.</p> <p>5 Q. Okay. Would it be fair to say that you are</p> <p>6 more knowledgeable than the average K9 handler about</p> <p>7 the principles of K9 handling and the industry and best</p> <p>8 practices?</p> <p>9 A. I would say yes.</p> <p>10 Q. Okay. Are you more knowledgeable, in your</p> <p>11 estimation, than Deputy Molina about those matters?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. You reference remediation in</p> <p>14 paragraph 3, remediation of K9 teams, and I just was</p> <p>15 curious what that meant.</p> <p>16 A. The dog is not always 100 percent. It's a</p> <p>17 living creature and sometimes we've got to go back and</p> <p>18 work with them.</p> <p>19 Q. When you say "the dog is not always</p> <p>20 100 percent," I assume you mean the dog is not always</p> <p>21 100 percent correct when attempting to sniff out</p> <p>22 illegal narcotics?</p> <p>23 A. That would be a black and white assessment and</p> <p>24 it's not always black and white.</p> <p>25 Q. I'm not sure I understand what you're saying.</p>
<p style="text-align: right;">Page 39</p> <p>1 right?</p> <p>2 A. I do certification examinations for two</p> <p>3 different entities.</p> <p>4 Q. What are those entities?</p> <p>5 A. The National Police K9 Association, I'm a</p> <p>6 certifying official for.</p> <p>7 Q. Okay.</p> <p>8 A. And Utah Police Academy.</p> <p>9 Q. Okay. And then in those two capacities, about</p> <p>10 how many K9 teams would you say that you have</p> <p>11 certified?</p> <p>12 A. With NPCA, it is a team effort. So it's a</p> <p>13 little bit difficult to give you a number, but we</p> <p>14 probably run 30-plus in my area per year.</p> <p>15 Q. Got it. And then what about Utah Police</p> <p>16 Academy?</p> <p>17 A. Sparse.</p> <p>18 Q. Okay.</p> <p>19 A. I do -- I go up and help as a team effort,</p> <p>20 again, and I might do one event, another -- judge</p> <p>21 during another event.</p> <p>22 Q. Okay.</p> <p>23 A. And so I do that every few years. The most</p> <p>24 recent I did was three human remains detection dogs</p> <p>25 last month.</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Correct and not correct would be a go or no-go</p> <p>2 approach to looking at a dog, and that is not</p> <p>3 sufficient.</p> <p>4 Q. Maybe treat me like I'm a student in one of</p> <p>5 your classes who has never done this because I think</p> <p>6 I'm still not following what you're saying.</p> <p>7 A. I'll try to give you an example.</p> <p>8 Q. Okay.</p> <p>9 A. If you're -- if you're carving wood and I'm an</p> <p>10 instructor and I think you can do better, I will try to</p> <p>11 instruct you to do better so that your carving is</p> <p>12 better.</p> <p>13 Q. Okay, got it. So it's sort of a spectrum is</p> <p>14 what you're saying?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. When you're assessing whether to do</p> <p>17 remediation for a K9 team, I would assume, but tell me</p> <p>18 if I'm getting this wrong, that you're applying your</p> <p>19 understanding of the core principles and industry best</p> <p>20 practices for K9 handling?</p> <p>21 A. That would be correct.</p> <p>22 Q. Okay. So there's at least like -- even if</p> <p>23 it's a spectrum, there's some threshold that you apply</p> <p>24 as Kevin Sheldahl to say, "This team needs</p> <p>25 remediation." Is that fair?</p>

<p style="text-align: right;">Page 42</p> <p>1 A. And some of that would vary based on context.</p> <p>2 Q. Okay. Let's say you're doing a narcotics --</p> <p>3 well, in your work in the Bernalillo County Sheriff's</p> <p>4 Department, so you're doing contracting work there</p> <p>5 right now, right?</p> <p>6 A. Correct.</p> <p>7 Q. And you're doing weekly trainings with K9</p> <p>8 handlers?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. In that capacity have you ever gone to</p> <p>11 a K9 team and said, "We have to do some remediation"?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Have you ever done that with a team</p> <p>14 that was a narcotics detection team?</p> <p>15 A. Yes.</p> <p>16 Q. How many times?</p> <p>17 A. There's no way in the world I could come up</p> <p>18 with a number.</p> <p>19 Q. Okay.</p> <p>20 A. My job is to find ways to improve all the</p> <p>21 time, and so the betterment of the program is my job.</p> <p>22 Q. Okay.</p> <p>23 A. So my job is to go out and say, "Here's what</p> <p>24 we can do better, let's do it."</p> <p>25 Q. So you do this all the time?</p>	<p style="text-align: right;">Page 44</p> <p>1 assess that kind of thing, though?</p> <p>2 A. Every day.</p> <p>3 Q. Okay. So tell me how you would go about</p> <p>4 assessing whether a team that was out on the streets</p> <p>5 doing narcotics detection needed to be pulled off the</p> <p>6 streets.</p> <p>7 A. Repeated misses, apparent false positives</p> <p>8 would cause me to slide into remediation immediately.</p> <p>9 And if that did not show immediate results, we would</p> <p>10 pull them until which time we felt like they had</p> <p>11 achieved the standard.</p> <p>12 Q. Okay, that's helpful. When you say "the</p> <p>13 standard," I assume you have something in mind there?</p> <p>14 A. There are many different standards within --</p> <p>15 within the community. I don't -- if you have looked,</p> <p>16 we have all kinds of acronyms for all kinds of</p> <p>17 organizations out there today and they grow every week,</p> <p>18 it seems like. So each one has their own.</p> <p>19 I tend to use, for myself, the Utah POST</p> <p>20 standards for -- as an assessment as to whether or not</p> <p>21 the dog is deployable.</p> <p>22 Q. So I haven't seen the Utah POST standards, but</p> <p>23 maybe you can give me a sketch of what that looks like.</p> <p>24 A. A series of -- a series of tests. And</p> <p>25 let's -- should we focus on narcotics? Because we can</p>
<p style="text-align: right;">Page 43</p> <p>1 A. Every single time we train.</p> <p>2 Q. Okay. You're doing remediation constantly?</p> <p>3 A. Remediation is improvement --</p> <p>4 Q. Okay. So maybe --</p> <p>5 A. -- and I want the teams to be the best they</p> <p>6 can be.</p> <p>7 Q. This is helpful because I -- maybe you can</p> <p>8 tell me the relationship or the difference between</p> <p>9 maintenance training and remediation because they sound</p> <p>10 different to me and maybe you --</p> <p>11 A. There's certainly an overlap here.</p> <p>12 Q. Okay.</p> <p>13 A. If it's all really good, then it's not</p> <p>14 remediation. If it needs some improvement or could</p> <p>15 have some improvement, then we slide into a</p> <p>16 remediation.</p> <p>17 Q. Okay. Has there ever been a situation in this</p> <p>18 work you're doing for the Bernalillo County Sheriff's</p> <p>19 Department -- sorry, that's a tongue twister for me --</p> <p>20 but has there ever been an occasion where you went to</p> <p>21 to a team that was deploying that K9 for detection and</p> <p>22 you said, "We have to pull this dog out of deployment</p> <p>23 because they shouldn't be out there on the streets"?</p> <p>24 A. In narcotics detection, no.</p> <p>25 Q. Okay. How would you -- is it your job to</p>	<p style="text-align: right;">Page 45</p> <p>1 be here forever.</p> <p>2 Q. I think, generally speaking, unless I ask</p> <p>3 otherwise, I'm asking about narcotics detection.</p> <p>4 A. Okay, good. Thank you.</p> <p>5 So in narcotics, there would be</p> <p>6 scenario-based testing that would include a variety of</p> <p>7 environments, a variety of diversions and distractions,</p> <p>8 and the team would be assessed based on the dog</p> <p>9 behavior and handler proficiency.</p> <p>10 Q. Okay. And we're going to -- we're going to</p> <p>11 get into some of these concepts later and I'm going to</p> <p>12 ask you kind of like from ground zero how this all</p> <p>13 works, so not to jump the gun on all of that, it's</p> <p>14 coming.</p> <p>15 But I'm more interested in this -- you</p> <p>16 mentioned repeated misses and apparent false positives</p> <p>17 and you mentioned a standard, so I was curious if you</p> <p>18 had like a percentage in mind or something like that.</p> <p>19 A. When I evaluate a team, I'm grading the dog in</p> <p>20 my head and the handler in my head. When I grade, I</p> <p>21 look at -- let me pause for a moment so this is not</p> <p>22 too -- it gets too cumbersome.</p> <p>23 Q. You can be cumbersome if you want.</p> <p>24 A. Okay, then we will be cumbersome. So I</p> <p>25 utilize a system that was handed down from the police</p>

<p style="text-align: right;">Page 46</p> <p>1 dog school in North Brunn (phonetic), Germany, and it  2 uses a series of grades. Those grades are one being  3 perfect and six being did not display the expected  4 behavior. And that -- the dog is looked at for their  5 ability to sniff, locate, indicate. The handler is  6 assessed on the overall ability to manipulate --  7 manipulate the dog through those searches. And the  8 grade must be lower than four --  9 Q. Okay.  10 A. -- to be passing.  11 Q. So you've got to be one to three on this  12 grading system that you use to pass?  13 A. 3.999.  14 Q. Thanks for being precise. So you do decimals?  15 A. We will do -- we will do a tenth.  16 Q. So 1.3 -- sorry, one to 3.90?  17 A. Yes.  18 Q. Okay. And it sounds like there's -- so you  19 grade both the handler and the dog --  20 A. Correct.  21 Q. -- on this scale? Okay.  22 I want to break this down a little bit,  23 so let's start with the frequency with which you're  24 doing this grading. How often are you grading the  25 handler and the dog on this scale?</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. And then how would you go about  2 evaluating -- in the training context, so not the  3 deployment context -- but in the training context, the  4 handler on this scale, what are the data inputs?  5 A. In the system we use, it's an overall view.  6 It's a single grade per scenario, and a handler who is  7 highly proficient makes absolutely -- does it so well  8 you can't figure out how to do it better, is a one, and  9 a handler who needs some remediation is falling into  10 the larger numbers.  11 Q. Okay.  12 A. And so that would be coaching them on leash  13 manipulation, presentation of areas to be sniffed,  14 their ability to observe the dog's behavior and  15 determine what that is. All of that is put into one  16 grade for a handler.  17 Q. Can I ask -- so on the handler side of the  18 grading that you're doing, either in your head or in  19 writing, what are some common things that a handler  20 might do that would cause them to lose points on your  21 grading system?  22 A. I can give you probably the number one reason.  23 Q. Sure, but I might ask for others.  24 A. Okay. The number one reason is failure to  25 present an area.</p>
<p style="text-align: right;">Page 47</p> <p>1 A. When -- I use this as a mental basis for  2 determining what our next step in training is. I'm not  3 just writing these numbers down. In fact, I rarely do.  4 Q. Okay.  5 A. This is a structure to make a determination as  6 to what we should be doing. So every time we train,  7 like I said before, we're trying to evaluate the team.  8 And so if the team is hovering around four, we need to  9 do something to bring them more into three and then  10 two.  11 Q. Okay. I want to understand kind of the input  12 to the grading system in a second, but before I get  13 there, are you also doing this grading, even if it's  14 just in your head, for the deployments out there in the  15 field or are you only doing it when they are training  16 in like a controlled environment?  17 A. I think I mostly apply it during training, but  18 the expectations of performance don't change.  19 Q. Okay. So just to give you like a hypothetical  20 example to make sure I get it, if a K9 -- if a  21 narcotics detection team is out there on the streets  22 and they were running a four to six on the scale,  23 either the handler or the dog, you would say, "Let's  24 pull them off the streets and do some remediation"?  25 A. Yes.</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Failure to present an area. Let's go through  2 all of the ones you can think of and then we will kind  3 of circle back.  4 A. Failure to present an area, failure to prepare  5 the dog, failure to read the dog's alert, pulling the  6 dog off of the odor or invading the dog's space and  7 pushing them off the odor. These are probably the most  8 common.  9 Q. Okay. If you saw a handler -- your report  10 mentions cuing, right? If you saw a handler cuing the  11 dog to alert or indicate, would that dock them points?  12 A. Absolutely.  13 Q. Okay. Why did you say it that way?  14 A. Cuing a dog, in the common sense of the word,  15 is that we told the dog to do something that shouldn't  16 be done, and so that's a major error. Sometimes  17 handlers fall into it, not knowing they are doing it,  18 and that's why we have testing.  19 Q. What would be an example of a handler cuing  20 their dog knowing that they are doing it, like how does  21 that look?  22 A. "Sit."  23 Q. Okay. So just to make sure I'm understanding  24 that example, sometimes a dog's alert or indication  25 behavior might be sitting, right?</p>

<p style="text-align: right;">Page 50</p> <p>1 A. Correct.</p> <p>2 Q. So if the handler verbally says "sit," that's</p> <p>3 an intentional cue, right?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. What about other knowing or intentional</p> <p>6 cues, what do those look like?</p> <p>7 A. It's so individual, that's why it takes</p> <p>8 experience to observe this stuff.</p> <p>9 Q. Sure.</p> <p>10 A. A handler may unintentionally be giving</p> <p>11 signals to a dog that he doesn't even know -- he or she</p> <p>12 doesn't know that they are giving, and so you observe</p> <p>13 that and you coach them out of that.</p> <p>14 Q. Well, can we just break it down? Because I</p> <p>15 want to be comprehensive about it. I want to</p> <p>16 understand in your -- what you have seen in the field,</p> <p>17 in your decades of experience, intentional cues looking</p> <p>18 like, just examples that come to mind. You mentioned</p> <p>19 "sit." Have you seen any others?</p> <p>20 A. Yeah, tapping on the -- tapping on something</p> <p>21 the dog has no real interest in is one that I've</p> <p>22 observed.</p> <p>23 Q. Okay.</p> <p>24 A. I've unfortunately observed it on police</p> <p>25 shows.</p>	<p style="text-align: right;">Page 52</p> <p>1 where the handler is putting the hand up, is it more</p> <p>2 likely that would be a cue than for a dog that doesn't</p> <p>3 have a history of gambling?</p> <p>4 A. That would depend on the team.</p> <p>5 Q. Okay. What more information do you need than</p> <p>6 the dog having a history of gambling?</p> <p>7 A. I have to observe the dog and the handler</p> <p>8 together. To say this is that, I can't do that.</p> <p>9 Q. Well, so I'm not asking you whether it's a</p> <p>10 definitive thing. I'm just asking whether if a dog has</p> <p>11 a history of gambling with that handler, that makes it</p> <p>12 more likely that they can be cued by something like a</p> <p>13 hand motion?</p> <p>14 A. We're jumping into the realm of maybe, and I</p> <p>15 don't know that I really want to be in maybe. That's</p> <p>16 why you have to observe the team.</p> <p>17 Q. Well, would it -- you don't think it would</p> <p>18 make it more likely?</p> <p>19 A. With you and your Golden Retriever, probably.</p> <p>20 Q. Okay, fair enough. That's totally fine.</p> <p>21 You mentioned unintentional cues.</p> <p>22 A. Yes.</p> <p>23 Q. So we've been talking about intentional cues,</p> <p>24 so with unintentional cues, what's going on there?</p> <p>25 A. I don't want to get out in the weeds too far,</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. All right. Any other things?</p> <p>2 A. That's -- those are probably the big ones.</p> <p>3 Q. You mentioned sitting. I have a Golden</p> <p>4 Retriever, so everything I know about dogs I know</p> <p>5 through the lens of my wonderful Golden Retriever,</p> <p>6 and -- for better or for worse. And, you know, when I</p> <p>7 want him to sit, I do upper hand motion, palm up and</p> <p>8 kind of fingers to the ceiling.</p> <p>9 Do you get what I'm saying?</p> <p>10 A. Sure.</p> <p>11 Q. Okay. So if a dog's alert or indication</p> <p>12 behavior is sitting and the handler doesn't say "sit,"</p> <p>13 but he does the hand motion, could that be an</p> <p>14 intentional cue?</p> <p>15 A. It could be, but not necessarily and maybe not</p> <p>16 very often.</p> <p>17 Q. Okay.</p> <p>18 A. The relationship between a dog and a handler</p> <p>19 is fairly individual, and so it's the observation of</p> <p>20 that team in its -- in its context that would allow you</p> <p>21 to look at a situation and say, "That was a cue.</p> <p>22 Whether the handler knew it or not, that was a cue."</p> <p>23 Q. Suppose -- we're going to get into this later,</p> <p>24 I promise, but suppose that a handler -- a dog has a</p> <p>25 habit of gambling with the handler. So in the context</p>	<p style="text-align: right;">Page 53</p> <p>1 but we often talk about something called the Clever</p> <p>2 Hans effect.</p> <p>3 Q. I was going to ask you about that.</p> <p>4 A. Okay.</p> <p>5 Q. So you're like stealing my thunder right now.</p> <p>6 A. Well, this is something we do.</p> <p>7 Q. Tell me the story.</p> <p>8 A. So Clever Hans was a horse, like the end of</p> <p>9 the 1800s, maybe early 1900s, in Germany who was</p> <p>10 supposed to be able to do all kinds of amazing math and</p> <p>11 calendar events and all kinds of things, and he would</p> <p>12 go around and do -- the owner would go do shows about</p> <p>13 how this animal could do all of these things that were</p> <p>14 amazing. And some behaviorists at the time said, "We</p> <p>15 don't believe this."</p> <p>16 And so what they discovered at the end,</p> <p>17 to make this story short, is that Clever Hans was</p> <p>18 pretty clever. He was observing the people and taking</p> <p>19 cues from the people in the audience. When you took</p> <p>20 the audience and the trainer away, Clever Hans wasn't</p> <p>21 any smarter than any other horse. But he was -- to me,</p> <p>22 he was amazing because any horse that could determine</p> <p>23 that he was getting to the number of pawing on the</p> <p>24 ground that was correct by watching fedora hats move is</p> <p>25 pretty amazing.</p>



<p style="text-align: right;">Page 54</p> <p>1 And so -- but from that, we take lessons.</p> <p>2 And so in K9 training, we try to extinguish that</p> <p>3 possibility the best that we can.</p> <p>4 Q. Okay. So connect that to unintentional cues</p> <p>5 for me.</p> <p>6 A. Well, an unintentional cue would be I'm</p> <p>7 wearing a fedora hat and every time that I -- that I</p> <p>8 think my dog has found something, I drop my head and he</p> <p>9 learns when the fedora hat goes down, I must be right.</p> <p>10 Q. Okay. I asked you earlier about examples of</p> <p>11 intentional cues that you had seen in your career.</p> <p>12 What are some unintentional cues that you have seen in</p> <p>13 your career?</p> <p>14 A. A handler changing his behavior when the</p> <p>15 dog -- and I try to -- let's take a step back --</p> <p>16 Q. Sure.</p> <p>17 A. -- because we're going to get all confused if</p> <p>18 I don't do this.</p> <p>19 Q. Okay. Yeah, please.</p> <p>20 A. Within the K9 industry, there are tremendous</p> <p>21 numbers of vocabulary and different uses of terms. One</p> <p>22 of the most difficult things that I have to do is sort</p> <p>23 out what people mean. And in this particular case, the</p> <p>24 vocabulary is not my vocabulary and it's not the</p> <p>25 vocabulary that I was handed through my education, so I</p>	<p style="text-align: right;">Page 56</p> <p>1 become a cheerleader.</p> <p>2 Q. I see. Okay, got it. That's helpful.</p> <p>3 In training?</p> <p>4 A. And in deployment.</p> <p>5 Q. Well, what if you don't know if there's drugs</p> <p>6 in the car?</p> <p>7 A. You can still turnaround and tell the dog,</p> <p>8 "You did a good job." They have been trained for</p> <p>9 proficiency.</p> <p>10 Q. So "good dog" is fine?</p> <p>11 A. Yes.</p> <p>12 Q. Okay, got it. What about -- I think I'm</p> <p>13 getting lost because I was asking you about</p> <p>14 unintentional cues.</p> <p>15 A. Yes.</p> <p>16 Q. And I do want to -- we're going to unpack some</p> <p>17 of this vocabulary, so -- but we're on unintentional</p> <p>18 cues and kind of what that looks like and what you have</p> <p>19 seen, right?</p> <p>20 A. Yeah.</p> <p>21 Q. So tell me examples of what you have seen</p> <p>22 unintentional cues look like.</p> <p>23 A. Handlers not knowing that that's what they</p> <p>24 just did, the example I just gave.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 55</p> <p>1 need to clear up that.</p> <p>2 There's a timeline to detection. It</p> <p>3 begins with whatever ritual that a -- that the handler</p> <p>4 creates that tells his dog, "We're going to do</p> <p>5 detection." Quite variable things in that.</p> <p>6 Then the sniff, then an alert. This is</p> <p>7 where the dog identifies an assigned odor and has a</p> <p>8 behavior associated with that. And then the find,</p> <p>9 which is where they get as close as they think they can</p> <p>10 get to it, followed by an indication, if it's possible.</p> <p>11 Deputy Molina, his education used</p> <p>12 different terms, so I want to make sure that we're</p> <p>13 understanding my terms and his terms.</p> <p>14 So a mistake of unintentional cues would</p> <p>15 be that if a handler observed an alert that every time</p> <p>16 that that happened or that he assumed that was</p> <p>17 happening, he said, "Good dog," and that was the only</p> <p>18 time that it was stated during the sniff.</p> <p>19 Q. Let me make sure I get that. Are you talking</p> <p>20 about your timeline of detection or the vocabulary that</p> <p>21 Deputy Molina used?</p> <p>22 A. My timeline.</p> <p>23 Q. Okay. So would that apply equally for an</p> <p>24 indication, not just an alert?</p> <p>25 A. No. Once the indication is there, you can</p>	<p style="text-align: right;">Page 57</p> <p>1 A. They don't know they are doing it.</p> <p>2 Q. Okay.</p> <p>3 A. Another might be that the handler doesn't keep</p> <p>4 moving along as if nothing happened and every time they</p> <p>5 see what they think might be an alert, in Deputy</p> <p>6 Molina's vocabulary, odor change.</p> <p>7 Q. Behavior change?</p> <p>8 A. Behavior change, that he immediately slides</p> <p>9 behind the dog to support that. That would be a</p> <p>10 possible, not always, but a possible unintentional cue.</p> <p>11 Q. So my Golden Retriever loves toys. I mean,</p> <p>12 obsessed. He has a Kong. Do you know what a Kong is?</p> <p>13 A. Oh, yeah.</p> <p>14 Q. Sorry, I don't mean to talk down or anything.</p> <p>15 I just want to make sure we're using the same terms.</p> <p>16 A. Yes.</p> <p>17 Q. It's like the rubber --</p> <p>18 A. Yes.</p> <p>19 Q. -- rubber ball looking thing. Sometimes it's</p> <p>20 on a rope, sometimes it's not, right?</p> <p>21 A. Sometimes it's what?</p> <p>22 Q. On a rope, sometimes it's not.</p> <p>23 A. Many different styles of Kong toys.</p> <p>24 Q. Yeah, but -- it's a brand, right?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q. Okay. So my dog, Samwise, loves Kongs. If  2 I -- this is my experience, right, so I'm not trying to  3 project too much, but if I grab his Kong, he starts  4 going ballistic, right. He changes his behavior in  5 response to me grabbing the Kong.  6 Does that make sense?  7 A. Correct.  8 Q. Okay. Can narcotics K9s do the same thing out  9 in the field?  10 A. Sure.  11 Q. So this unintentional cue thing we've been  12 talking about, if the dog's reward that they have been  13 trained with is a Kong, right?  14 A. Correct.  15 Q. And the handler manipulates the Kong during  16 the deployment, could that be an unintentional cue?  17 A. Not normally.  18 Q. Why not?  19 A. Because the dog knows he has a task to perform  20 before he earns that.  21 Q. And he knows that because a ritual was  22 performed?  23 A. Yeah. They are doing the same thing that they  24 have done many, many, many times and they have learned  25 that if they do not go out and sniff, and ultimately</p>	<p style="text-align: right;">Page 60</p> <p>1 they initiate the sniff, and that's communication to  2 the dog.  3 Q. Okay. If a handler just takes a dog out of  4 the patrol car and just goes straight to the vehicle  5 without anything, they just go straight into the sniff,  6 would that be sufficient to your mind?  7 A. If that's what the team does every single  8 time, it would be the ritual.  9 Q. Okay, got it. So a ritual doesn't really have  10 to be anything specific, it can just be a pattern?  11 A. Correct.  12 Q. Got it. That's helpful.  13 We were talking a while back about your  14 grading system and the different things that would dock  15 a handler from the one to three range, which is  16 passing -- to the one to 3.90 range, which is passing,  17 to the four to six range, which is failing, right?  18 A. Right.  19 Q. What are the things that would dock a dog on  20 that scale from passing to failing?  21 A. Not engaging in the sniff. Not identifying an  22 assigned odor, not attempting to work towards source  23 the find, what I call the find, but working into the  24 scent cone. I think I recall Deputy Molina call it  25 bracketing.</p>
<p style="text-align: right;">Page 59</p> <p>1 become successful, that the -- that the payment,  2 whatever that might be, is not available.  3 Q. Okay, got it. That's helpful.  4 And you mentioned the term "ritual."  5 What is that?  6 A. A very variable event.  7 Q. Uh-huh.  8 A. But whether handlers know it or not, they  9 somehow tell their dog, "We're going to go do a sniff."  10 Whether that's because they put their Kong in their  11 pouch or shove it in their pocket, step out of the car,  12 maybe they allow their dog to relieve itself before,  13 all of these things build up into ultimately becoming  14 communication to the dog that the next thing we're  15 going to do is a narcotics sniff. And so that is a  16 ritual. Some are more formalized than others.  17 Q. The dog needs to be aware that its ritual is  18 happening, right?  19 A. Yes.  20 Q. Okay. And the handler should perform a ritual  21 every time they do a deployment before they start the  22 sniff, right?  23 A. The way that I teach, it's very formal, but  24 not everybody teaches it that formal. Sometimes it is  25 simply that they do the same thing every time before</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. Uh-huh.  2 A. Of course, these -- these things all cascade,  3 and so if you fail on one end, you're probably going to  4 continue to fail. So they sort of hinge on one  5 another.  6 Q. Okay. And we -- this kind of all started  7 because you used terms that I found interesting,  8 repeated misses and false positives.  9 A. Correct.  10 Q. So repeated misses would be the dog in  11 training or in deployment is repeatedly out there just  12 not detecting the assigned odors?  13 A. Correct.  14 Q. Okay. And is there a percentage or a hit rate  15 or fail rate you have in mind that you would say like  16 "This is not sufficient"?  17 A. That would be reflected in my grading system  18 and they would fall below that threshold.  19 Q. Well, I'm trying to figure out how -- how you  20 do that math, right, so let me give you an example, if  21 that's helpful.  22 A. Yeah.  23 Q. Suppose that you have a dog that, whether in  24 training or deployment -- it sounds like the data is  25 the same to you, right?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. To me it's the same.</p> <p>2 Q. Okay. So the dog goes out, sniffs 100 cars</p> <p>3 and fails to detect the assigned odor 90 percent of the</p> <p>4 time. Is that going to be a failing grade for that</p> <p>5 dog?</p> <p>6 A. Certainly.</p> <p>7 Q. Okay. What about -- I'm just going to go down</p> <p>8 the spectrum, unless you can tell me the percentage at</p> <p>9 which you would cut it off.</p> <p>10 A. I can give you just a general --</p> <p>11 Q. Sure.</p> <p>12 A. And let's step away from the way that I assess</p> <p>13 dogs and let's use the other organizations here in the</p> <p>14 U.S. Most have two ways of failing; missing or false</p> <p>15 indicating.</p> <p>16 Q. I'm going to ask you about that. So we're on</p> <p>17 missing right now.</p> <p>18 A. All right. And so missing, if -- in the -- if</p> <p>19 a dog missed three out of ten, they are probably</p> <p>20 sitting in the failing range with most organizations.</p> <p>21 This is a big generalization.</p> <p>22 Q. Sure.</p> <p>23 A. But if they miss three out of ten, they are</p> <p>24 probably not going to pass. If they miss -- yeah,</p> <p>25 that's -- for misses, that's probably getting to the</p>	<p style="text-align: right;">Page 64</p> <p>1 A. I don't have to be -- it's not a go or no-go,</p> <p>2 100 percent or not. It is a proficiency exam in a</p> <p>3 scenario instead of a go or no-go test.</p> <p>4 Q. Do you take any issue with the kind of "you</p> <p>5 have to be right 70 percent of the time" standard that</p> <p>6 these other organizations use?</p> <p>7 A. Do I have issue with it?</p> <p>8 Q. I'm just asking if -- I don't know, if you</p> <p>9 think it's flawed in some way or if you're fine with</p> <p>10 that being used across the country?</p> <p>11 A. First, I'm going to -- I'm going to set this</p> <p>12 up with the idea that we all have ways that we think</p> <p>13 organizations could do better.</p> <p>14 Q. Sure.</p> <p>15 A. And that I believe that the handler needs a</p> <p>16 grade, too. So none of the organizations that I'm</p> <p>17 familiar with --</p> <p>18 Q. Oh, I see.</p> <p>19 A. -- doing narcotics detection grades the</p> <p>20 handler. They treat it as a go/no-go with the dog.</p> <p>21 Q. Okay, that's helpful. And I'm not trying to</p> <p>22 get you to cast dispersions on these other</p> <p>23 organizations.</p> <p>24 All I really want to know is we have</p> <p>25 talked about, with repeated misses, the fact that there</p>
<p style="text-align: right;">Page 63</p> <p>1 point where, hey, this is a problem.</p> <p>2 Q. So if a dog is missing 70 percent of the time</p> <p>3 they sniff a car, most organizations across the country</p> <p>4 would fail that dog?</p> <p>5 A. No, if they are missing more than 30 percent</p> <p>6 of the time.</p> <p>7 Q. That's what I'm saying, if they are missing 70</p> <p>8 percent of the time --</p> <p>9 A. No, they are missing 30 percent of the time.</p> <p>10 Q. Oh, okay.</p> <p>11 A. Now their percentage of success is falling</p> <p>12 down to 70.</p> <p>13 Q. Got it. And most organizations will not pass</p> <p>14 a dog for that.</p> <p>15 Q. Okay. What about you? Because you kind of</p> <p>16 diverted to what other people are doing, but I'm</p> <p>17 curious about you, too.</p> <p>18 A. There are some components when I'm looking at</p> <p>19 a Utah POST approach. We give a grade to the sniff, we</p> <p>20 give a grade to the alert and indication. And so a dog</p> <p>21 could do a poor indication on some, but not fall below</p> <p>22 the threshold on the grade. So it's a different</p> <p>23 concept. It's a little bit more like you and I are</p> <p>24 graded on a test.</p> <p>25 Q. Uh-huh.</p>	<p style="text-align: right;">Page 65</p> <p>1 are organizations across the country that certify dogs</p> <p>2 that use 70 percent as that kind of standard.</p> <p>3 Do you have an issue with that number, at</p> <p>4 least in terms of the way that they use it?</p> <p>5 A. No.</p> <p>6 Q. Okay. So you wouldn't prefer to be higher or</p> <p>7 lower is what I'm asking?</p> <p>8 A. I prefer to be -- to be in the 90s.</p> <p>9 Q. Okay, I see what you're saying.</p> <p>10 A. If we go back to what I said earlier, my job</p> <p>11 is to better teams.</p> <p>12 Q. Yeah, yeah.</p> <p>13 A. But -- and a certification test is a minimum</p> <p>14 standard.</p> <p>15 Q. I see.</p> <p>16 A. And we want to be better than minimum. At</p> <p>17 least that's my approach to this work.</p> <p>18 Q. That's great. That's all I wanted to know.</p> <p>19 And in terms of false positives, what are</p> <p>20 those?</p> <p>21 A. We've already spoke about it. Probably the</p> <p>22 most common one is a dog gambling. He decides "Maybe I</p> <p>23 can shortcut this to get my toy."</p> <p>24 Q. So I said we were going to define that term.</p> <p>25 Can we take a step back and define "gambling"?</p>

<p style="text-align: right;">Page 66</p> <p>1 A. Gambling is a dog trying to obtain something 2 that doesn't come through the work that he was trained 3 to do. Dogs are big gamblers, and so if I can fool you 4 into giving me something for a job not done and I'm a 5 dog, I will try that. At some point in every dog's 6 basic training, they try it. We let it fail so it 7 extinguishes itself. 8 Q. Okay. So back to the kind of question of 9 false positives, then. So to use the lingo we just 10 kind of -- we just kind of got at, if a dog sniffs a 11 car and sits, because that's his assigned indication or 12 alert behavior, as a gamble to try to get a reward from 13 the handler, but there is nothing in the car, that 14 would be a false positive using your terminology? 15 A. That would be very difficult to determine in 16 the real world. 17 Q. Let's just start with training. So -- 18 A. Even in training, I have had dogs do that and 19 I hadn't placed a find and we found -- we found drugs. 20 We use a lot of training -- do a lot of training in 21 places where either other people are training or we 22 trained before. 23 Q. Sure. 24 A. Or people's cars have been towed in. It's -- 25 we work in -- we have to train in the real world,</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. Okay. 2 A. When we're out in the real world, it's a very 3 difficult thing so it gets done in early training. 4 Q. That makes sense. So back on the question 5 of -- of -- we talked about a percentage that 6 organizations nationwide use on repeated misses. Is it 7 the same percentage for false positives? 8 A. Every organization has different rules. We 9 would have to look at each individual set of rules to 10 make a determination. If a -- if -- during an NPCA 11 certification, if a dog gave two false positives or 12 gambled, or whatever they did during the test, and we 13 determine this because we run a trained dog that we're 14 confident in prior to the test, so the environment has 15 been worked. And so if a dog does that and does it 16 twice, that's the end. 17 Q. Out of how many? 18 A. Oh, let me see. It depends on the number of 19 substances being certified. So there will be -- let's 20 say they're doing four substances, five searches 21 inside, one will be a blank and the other will have one 22 of each of the substances certifying them, and a 23 similar situation with five cars. 24 Q. Okay. So we're talking about ten sniffs, five 25 inside and then five cars, right?</p>
<p style="text-align: right;">Page 67</p> <p>1 unfortunately. 2 Q. Yeah. 3 A. And we can't work in a sterile environment. 4 So the -- "Is he really wrong?" is often a very unclear 5 question. 6 Q. Well, you're the one who used the term "false 7 positive," so I just wanted to make sure I understood 8 what it meant. And then you gave me the example of 9 gambling, so I thought you were saying that gambling 10 behavior is false positive behavior. 11 A. No, that -- 12 Q. So -- okay. 13 A. So what you have to realize is that in the 14 real world, I can't always determine a false positive. 15 Sometimes, in the training -- in the context of 16 training, I can set it up because I own that 17 environment. 18 An example is early on, I utilize a 19 series of cubbyholes and we clean them when we're done. 20 And if a dog picks the wrong one, I know he's gambling 21 and it is a false positive because there can be nothing 22 there. That's where we try to finish the problem with 23 false positives and gambling -- 24 Q. Okay. 25 A. -- is in a controlled environment.</p>	<p style="text-align: right;">Page 69</p> <p>1 A. Correct. 2 Q. For standard certifications, right? 3 A. Correct. 4 Q. There will be two blanks total, one for each 5 set of five, right? 6 A. Correct. 7 Q. Okay. 8 A. Well, on the cars, yeah. 9 Q. Okay. And so the question we're trying to 10 answer here is how many false positives would fail the 11 dog? 12 A. Two. 13 Q. Out of ten or two out of five? 14 A. Ten. 15 Q. Okay. So if the dog is falsely alerting or 16 indicating 20 percent of the time, that would fail the 17 dog? 18 A. It's a little more complicated than that -- 19 Q. Okay. 20 A. -- because they have to tell us that it's -- 21 "Here it is," and if they are saying that during a 22 search, they also missed the find. So it becomes 23 double jeopardy. 24 Q. I see what you're saying. 25 Suppose a dog -- we're just looking at</p>

<p style="text-align: right;">Page 70</p> <p>1 the false positive number and we're grading the dog for</p> <p>2 certification and we know that they false positive</p> <p>3 20 percent of the time, two out of ten, that's going to</p> <p>4 fail the dog, right?</p> <p>5 A. Yes. And it will actually be down like --</p> <p>6 more like 60 percent because they also missed two.</p> <p>7 Q. I see what you are saying, yeah.</p> <p>8 Okay. We're still on page 2 of your</p> <p>9 report, believe it or not.</p> <p>10 (Recess from 10:48 a.m. to 11:01 a.m.)</p> <p>11 Q. (BY MR. WINDHAM) Okay. we're back on the</p> <p>12 record, Mr. Sheldahl. Do you recognize you are still</p> <p>13 under oath?</p> <p>14 A. Yes.</p> <p>15 Q. Great. So earlier I asked you a few questions</p> <p>16 about assessing dog -- K9 handlers and their dogs.</p> <p>17 Do you remember that?</p> <p>18 A. Yes.</p> <p>19 Q. And we were talking both about training and</p> <p>20 deployments, right?</p> <p>21 A. Correct.</p> <p>22 Q. And there were a few times during that</p> <p>23 conversation where you mentioned you would really like</p> <p>24 to observe the handler team over time to kind of see</p> <p>25 what their dynamic is like.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. Okay. There's a reference in your report, so</p> <p>2 we're still on Exhibit 105, to -- let's see. Go to</p> <p>3 page 2 for me, and I'm going to ask you about</p> <p>4 paragraphs 10 and 11 there. So paragraph 10 says, "I</p> <p>5 have produced numerous training DVDs and online</p> <p>6 training programs through Leerburg Video Productions on</p> <p>7 police dog training --"</p> <p>8 THE REPORTER: Through --</p> <p>9 MR. WINDHAM: Leerburg.</p> <p>10 THE REPORTER: Oh, okay.</p> <p>11 Q. (BY MR. WINDHAM) I'll read it again. "I have</p> <p>12 produced various -- sorry, I have produced numerous</p> <p>13 training DVDs and online training programs through</p> <p>14 Leerburg Video Productions on police dog training and</p> <p>15 detection K9 training."</p> <p>16 Did I get that right?</p> <p>17 A. That's correct.</p> <p>18 Q. Okay. So what is Leerburg Video Productions?</p> <p>19 A. Leerburg is -- they are a vendor of dog</p> <p>20 training equipment and they also sell informational</p> <p>21 DVDs and streaming of dog sports and dog training, you</p> <p>22 know, of various types. And they also have online</p> <p>23 training courses that an individual can sign up for and</p> <p>24 take.</p> <p>25 Q. Okay. And so your point here with</p>
<p style="text-align: right;">Page 71</p> <p>1 Do you remember that?</p> <p>2 A. Yes. It's better than just a snapshot.</p> <p>3 Q. Well, there -- I just -- there were a few</p> <p>4 moments where I asked you a question and it seemed like</p> <p>5 you were hesitant to give me an answer because it's</p> <p>6 hard to generalize when really you want to look at the</p> <p>7 specific handler and the dog sometimes. Is that fair?</p> <p>8 A. I think the context was -- at least for me,</p> <p>9 was that you were asking about improvements and</p> <p>10 betterment, which I explained was part of what I do</p> <p>11 every single day.</p> <p>12 Q. Right. And so that improvement and</p> <p>13 betterment, when you're assessing whether a team could</p> <p>14 be improved or could be bettered, you would want to</p> <p>15 look at that team's training, deployment, that kind of</p> <p>16 thing?</p> <p>17 A. Correct.</p> <p>18 Q. For Deputy Molina and K9 Max, did you review</p> <p>19 any deployment videos other than the stop involved in</p> <p>20 this case?</p> <p>21 A. The videos I reviewed were the stop in this</p> <p>22 case and the videos from NCATS assessments.</p> <p>23 Q. Okay. Did you review any training videos or</p> <p>24 deployment videos, other than the NCATS videos?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 73</p> <p>1 paragraph 10 is that you have produced some of those</p> <p>2 courses?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. And then paragraph 11 there says, "I</p> <p>5 have produced an online training course on professional</p> <p>6 detection dog training through Leerburg University."</p> <p>7 Did I get that right?</p> <p>8 A. Correct.</p> <p>9 Q. Is Leerburg University a different entity than</p> <p>10 Leerburg Video Productions?</p> <p>11 A. I don't think that it's a different entity.</p> <p>12 It's a different title on the web page.</p> <p>13 Q. Okay, got it. So it's all just Leerburg?</p> <p>14 A. Correct.</p> <p>15 Q. Okay, got it. And the online course that</p> <p>16 you've produced on professional detection dog training,</p> <p>17 does that include narcotics detection?</p> <p>18 A. It's a general introduction to training dogs</p> <p>19 for detection of all types.</p> <p>20 Q. Okay. And that would include police narcotics</p> <p>21 detection?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Is it fair to say that the courses that</p> <p>24 you have produced for Leerburg are based on your</p> <p>25 extensive resume?</p>

<p style="text-align: right;">Page 74</p> <p>1 A. Yes.</p> <p>2 Q. And all the experience you have gained over</p> <p>3 the course of decades in this field?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And the written materials that you</p> <p>6 produced --</p> <p>7 MR. FRIGERIO: He's disconnected again.</p> <p>8 (Discussion off the record)</p> <p>9 Q. (BY MR. WINDHAM) Mr. Sheldahl, we're back on</p> <p>10 the record after a delay. Do you recognize you're</p> <p>11 still under oath?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. I was asking you if it's fair to say</p> <p>14 that the written content that you've produced for the</p> <p>15 courses through Leeburg is a reflection of your</p> <p>16 knowledge and experience and training?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And that's all -- the detection course</p> <p>19 that you just mentioned, that covers, I would assume,</p> <p>20 the kind of basics and fundamentals of training a</p> <p>21 detection dog?</p> <p>22 A. Correct.</p> <p>23 Q. Training them appropriately so that they are</p> <p>24 successful in the field?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 76</p> <p>1 focus on the categories that I have experience in.</p> <p>2 Q. So a narcotics detector dog, then, is a dog</p> <p>3 that is trained to alert on assigned narcotic</p> <p>4 substances, right?</p> <p>5 A. Correct.</p> <p>6 Q. And that's -- I assume it's always illegal</p> <p>7 narcotics. Is there ever -- is there such thing as a</p> <p>8 narcotics detection dog that is supposed to detect</p> <p>9 legal narcotics?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. What about in the law enforcement</p> <p>12 context?</p> <p>13 A. Well, corrections, part of law enforcement,</p> <p>14 often uses dogs, and I tend to call them contraband</p> <p>15 dogs.</p> <p>16 Q. I see.</p> <p>17 A. But often they are finding Suboxone, which is</p> <p>18 a prescription drug. And so it's not unusual to do</p> <p>19 that.</p> <p>20 Q. These are at jails, you mean?</p> <p>21 A. Yeah, correctional facilities.</p> <p>22 Q. Got it.</p> <p>23 A. Jails and prisons.</p> <p>24 Q. Got it. In terms of deploying dogs out in the</p> <p>25 street, though, I assume -- I mean, you can tell me if</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. Okay. So if I wanted to learn kind of the</p> <p>2 fundamentals of all of that, I could just take one of</p> <p>3 your courses, right?</p> <p>4 A. You could.</p> <p>5 Q. Okay. Let me just ask you, kind of sitting</p> <p>6 here today, we can maybe talk about one of your</p> <p>7 courses, but before we kind of get there, maybe I -- I</p> <p>8 asked you earlier to kind of treat me like a student,</p> <p>9 like I don't know much about this, and I don't. Let's</p> <p>10 just start with some basic ideas, like we talked about</p> <p>11 vocabulary a little bit.</p> <p>12 So what is a detector dog?</p> <p>13 A. Detection just is a big category.</p> <p>14 Q. Uh-huh.</p> <p>15 A. We have detection dogs for dope and bombs and</p> <p>16 human remains, and those are the areas that I focus on</p> <p>17 the most. But you could have a detection dog that</p> <p>18 finds termites, bedbugs, mold, electronic storage</p> <p>19 devices, blood spatter. I just read an article about a</p> <p>20 semen detector dog in Sweden. There's all kinds of</p> <p>21 biological detector dogs. We're seeing them now being</p> <p>22 worked in certain research arenas for determining</p> <p>23 whether a dog can find cancers and even COVID.</p> <p>24 Q. That's amazing.</p> <p>25 A. So there's a lot of stuff and a lot of -- I</p>	<p style="text-align: right;">Page 77</p> <p>1 I'm reading this wrong -- I assume the point of a</p> <p>2 narcotics dog is to sniff out assigned illegal</p> <p>3 narcotics?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And those might depend on the nature of</p> <p>6 the area or the department, which ones are assigned.</p> <p>7 Is that fair?</p> <p>8 A. Very much so.</p> <p>9 Q. Okay. Well, I don't know, you gave me a face,</p> <p>10 so I thought maybe I would ask you what's going on in</p> <p>11 your head.</p> <p>12 A. Well, the first thing that goes on in my head</p> <p>13 is that we're going -- this country is going to have</p> <p>14 blanket legalized marijuana shortly. That's my belief,</p> <p>15 anyway. And I haven't trained a dog worked on the</p> <p>16 street by law enforcement to do marijuana now in maybe</p> <p>17 three years, four years. It's been -- it's being</p> <p>18 dropped out, even in states where marijuana is still a</p> <p>19 violation.</p> <p>20 Q. Why haven't you trained a dog to do that in</p> <p>21 three years?</p> <p>22 A. I have been asked not to.</p> <p>23 Q. By?</p> <p>24 A. Departments.</p> <p>25 Q. Okay, got it. Even in states where it's</p>



<p style="text-align: right;">Page 78</p> <p>1 legal?</p> <p>2 A. Correct.</p> <p>3 Q. Why is that?</p> <p>4 A. You would have to ask them their motivation.</p> <p>5 Maybe they believe, like I do, that it's going to get</p> <p>6 shifted to a Schedule III drug any day.</p> <p>7 Q. Oh, I see. Okay. You talked about the</p> <p>8 potential for future nationwide legalization of</p> <p>9 marijuana, and it is legal in certain states, right?</p> <p>10 A. My state, it's recreational.</p> <p>11 Q. In New Mexico?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And there is also a thing called hemp,</p> <p>14 right, that -- that is legal nationwide, right?</p> <p>15 A. Since Trump created a new regulation, yes.</p> <p>16 Q. The Farm Bill?</p> <p>17 A. Yes.</p> <p>18 Q. In 2019?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Explain to me what hemp and marijuana</p> <p>21 are.</p> <p>22 A. I'm not a -- I'm not a botanist, but my</p> <p>23 understanding is they are the same species.</p> <p>24 Q. So we're talking about the same plant, the</p> <p>25 same leaf. I think -- my understanding is there's</p>	<p style="text-align: right;">Page 80</p> <p>1 an odor that it's been reinforced for over and over and</p> <p>2 over again.</p> <p>3 Q. Okay. So an alert behavior change is just</p> <p>4 something the dog is going to do, I don't know,</p> <p>5 innately?</p> <p>6 A. I'm not sure innately is the right word.</p> <p>7 Maybe intrinsically.</p> <p>8 Q. Okay, that's fine. I guess what I'm asking</p> <p>9 you, in kind of a not artful way, is just does the</p> <p>10 handler pick what the behavior is?</p> <p>11 A. No.</p> <p>12 Q. Okay. So it's just specific to whatever the</p> <p>13 dog chooses to do to innately or intrinsically start to</p> <p>14 lock into that odor?</p> <p>15 A. Yeah. It's a conditioned response.</p> <p>16 Q. Got it. Okay. And then the indication is</p> <p>17 different, right? So what's an indication?</p> <p>18 A. It could be a variety of things and a -- or a</p> <p>19 group of things.</p> <p>20 Q. Well, let's start with what an indication</p> <p>21 signifies because you said earlier an alert signifies</p> <p>22 that the dog is detecting the odor. So what does an</p> <p>23 indication signify?</p> <p>24 A. An indication is a behavior that is analogous</p> <p>25 to a flushing behavior in a bird dog. They have</p>
<p style="text-align: right;">Page 79</p> <p>1 different levels of THC, that's the only difference?</p> <p>2 A. You would have to ask about the specifics of</p> <p>3 that from somebody who is really knowledgeable in</p> <p>4 botany.</p> <p>5 Q. Okay.</p> <p>6 A. And it's not me.</p> <p>7 Q. Okay. In terms of -- well, I'll circle back</p> <p>8 to that in a second, actually. I want to get to focus</p> <p>9 on illegal substances and we will kind of go back to</p> <p>10 legal.</p> <p>11 So in terms of training dogs to detect</p> <p>12 illegal substances, we talked about alerts and</p> <p>13 indications, right?</p> <p>14 A. Correct.</p> <p>15 Q. What are alerts and indications?</p> <p>16 A. An alert is the behavior that's displayed by a</p> <p>17 dog when he identifies a substance he's trained to</p> <p>18 locate.</p> <p>19 Q. Okay. So is that the dog kind of starting to</p> <p>20 lock into the substance or is the dog communicating to</p> <p>21 the handler, "I know it's here"?</p> <p>22 A. It's not communicating to the handler at all.</p> <p>23 Q. Okay.</p> <p>24 A. It's a behavior change that becomes</p> <p>25 conditioned in the dog. It's a conditioned response to</p>	<p style="text-align: right;">Page 81</p> <p>1 located their prey and a bird dog might stand, it might</p> <p>2 lay down, it might point. We all know about pointers.</p> <p>3 Q. Uh-huh.</p> <p>4 A. And, you know, if you're a terrier, you might</p> <p>5 dig. These are behaviors that the dogs have.</p> <p>6 Sometimes we shape those behaviors to be something more</p> <p>7 of what we want, but they are analogous to that.</p> <p>8 Q. Okay. Is it standard in the K9 handling world</p> <p>9 to pick what behavior the dog displays when they</p> <p>10 indicate?</p> <p>11 A. That would depend dramatically on who did the</p> <p>12 training and -- and their background in training. It's</p> <p>13 variable across the field.</p> <p>14 Q. When you -- you have a course through Leeburg</p> <p>15 that you offer on this, right?</p> <p>16 A. Correct.</p> <p>17 Q. Do you -- do you train folks to choose the</p> <p>18 indication behavior or is it -- do you leave it up to</p> <p>19 the handler?</p> <p>20 A. I try -- for -- let's focus on narcotics</p> <p>21 because --</p> <p>22 Q. Yeah, I'm trying to.</p> <p>23 A. -- there's some basics in -- we have to do</p> <p>24 different things for explosive stuff for safety</p> <p>25 reasons.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q. Yeah.</p> <p>2 A. But in narcotics, I like to let the dog</p> <p>3 choose.</p> <p>4 Q. Okay. And you talked earlier about sitting is</p> <p>5 like one common indication behavior, right?</p> <p>6 A. It's not uncommon at all.</p> <p>7 Q. It's not uncommon, and there are others. What</p> <p>8 are some others that you have seen?</p> <p>9 A. Well, first, an indication is not a behavior.</p> <p>10 It may be multiple behaviors. So it's the behavior the</p> <p>11 dog has where it would like to flush its pray.</p> <p>12 Q. Sure.</p> <p>13 A. And so a dog may go down, a dog may -- in the</p> <p>14 context of narcotics, we don't usually want to promote</p> <p>15 barking, but it could be. It could be staring, it</p> <p>16 could be sitting, it could be scratching. Another</p> <p>17 behavior we don't like, but it does occur, is biting.</p> <p>18 It's a safety issue for the dog, of course.</p> <p>19 So all of those could be promoted and</p> <p>20 many of them could appear at different points in time</p> <p>21 as the indication in a given dog.</p> <p>22 Q. How does a handler train a dog to alert or</p> <p>23 indicate to assigned odors?</p> <p>24 A. The most common methodology is pairing it with</p> <p>25 something, a prey item.</p>	<p style="text-align: right;">Page 84</p> <p>1 that.</p> <p>2 Q. So your -- your point about Max is just that</p> <p>3 you don't -- I assume you're getting at the fact that</p> <p>4 we don't really know -- we don't have records from</p> <p>5 his -- the vendor that he was purchased from?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. So you just don't know about what his</p> <p>8 foundation looked like at all?</p> <p>9 A. Yeah, we don't have a curriculum or anything.</p> <p>10 Q. Okay. Your opinion, though, is that that's --</p> <p>11 A. This has been -- this has been far enough</p> <p>12 down -- downstream from this that it's probably</p> <p>13 completely irrelevant.</p> <p>14 Q. Okay. I mean, you don't think that your</p> <p>15 opinions are changing one way or the other based on the</p> <p>16 fact that he doesn't have foundation records, do you?</p> <p>17 A. No.</p> <p>18 Q. Okay. In terms of the post-foundation period,</p> <p>19 so the dog has been acquired by a vendor, they are with</p> <p>20 a handler and a police department on a K9 unit, I'm</p> <p>21 wondering about rewards and how those play into all of</p> <p>22 this.</p> <p>23 A. It's the reinforcer that keeps the behavior</p> <p>24 alive.</p> <p>25 Q. Okay. So the idea is like -- let's see if I</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. What does that mean?</p> <p>2 A. I'll give you an an example about how I tend</p> <p>3 to do it most of the time. It's not always. There are</p> <p>4 other methodologies, but probably the most common is</p> <p>5 to -- I'll take a little white pallet, roll it up and</p> <p>6 tie it up and put it in with the substance that I want</p> <p>7 the dog to locate. And so it begins to associate that</p> <p>8 odor with its pray item, play tug-of-war with the white</p> <p>9 towel once he finds it. Later on, it appears out of</p> <p>10 nowhere, he flushes it and is reinforced by that</p> <p>11 behavior.</p> <p>12 Q. Okay. What role does a handler play in</p> <p>13 reinforcing or conditioning dogs in this training</p> <p>14 process?</p> <p>15 A. The reinforcement for a dog is often done by</p> <p>16 the handler at a point when the dog has learned the</p> <p>17 foundations. And one thing that does appear to be</p> <p>18 missing here with Max is I know nothing about his</p> <p>19 foundation. What we know about is his history, which</p> <p>20 now becomes the most important and over -- overarching</p> <p>21 part of it.</p> <p>22 But to go back to foundations is</p> <p>23 initially the handler has nothing to do with it. The</p> <p>24 dog believes he's doing it. It's all the dog, "I flush</p> <p>25 my pray." And we have a lot of techniques that produce</p>	<p style="text-align: right;">Page 85</p> <p>1 get this right. A dog, when they are coming from a</p> <p>2 vendor at the foundation level, that's when they learn</p> <p>3 their assigned odors. Is that fair?</p> <p>4 A. They could learn them later if they needed to</p> <p>5 add.</p> <p>6 Q. They could?</p> <p>7 A. Certainly.</p> <p>8 Q. Okay. But at least generally speaking, a dog</p> <p>9 is going to come from a vendor, they are going to have</p> <p>10 a list of odors, they have been through this flushing</p> <p>11 process you were talking about and the primary reward</p> <p>12 system you were just describing, right?</p> <p>13 A. Correct.</p> <p>14 Q. They are going to have their assigned odors</p> <p>15 when they are purchased, and that could be edited, but</p> <p>16 they are going to have their assigned odors?</p> <p>17 A. It depends on the way that you -- on the</p> <p>18 organization of the place that supplied the dog. I can</p> <p>19 only speak for myself here.</p> <p>20 Q. Sure.</p> <p>21 A. I get dogs when they are prepared to get</p> <p>22 started, but I haven't assigned an odor because I don't</p> <p>23 know if they are going to be a human remains dog, a</p> <p>24 bomb dog or a dope dog.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 86</p> <p>1 A. So I don't do that until the handler is in 2 class and the handler learns right along with the dog. 3 We pair them together and the education gets started. 4 Q. Maybe it will help me to understand the 5 difference between a reward and a reinforcement, if 6 there is one. 7 A. Yeah, there kind of is. 8 Q. Okay. 9 A. Things could be reinforcing that are not 10 rewards, but a reward will always be a reinforcer. 11 Q. Okay, that's helpful. A reward is always a 12 reinforcer. So what could be reinforcing that is not a 13 reward? 14 A. So dogs have intrinsic behaviors. 15 Q. Okay. 16 A. Sometimes they will do things that make them 17 feel good. And I'll give you an example where it's a 18 reinforcement that there is no reward. Does your 19 Golden Retriever chase rabbits? 20 Q. He's kind of a coward, so no. 21 A. Okay. Let's say he does, but is he really 22 fast enough to catch a rabbit every time? 23 Q. No. 24 A. So where is the -- where is the reinforcer? 25 Q. The chase?</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Got it. For -- I mean, just tell me if I'm 2 getting this basically right and if I'm not, just 3 correct me. 4 So for a narcotics K9, say you want the 5 narcotics K9 -- like Max, it's marijuana, meth, cocaine 6 and heroin are the four substances that he is trained 7 to detect, right? 8 A. Correct. 9 Q. Okay. So say you want to train a dog to 10 detect those four substances. Would the handler's role 11 in that be, at least in part, reinforcing when the dog 12 has detected them with a reward? 13 A. Absolutely. 14 Q. Okay, that's helpful. 15 And then you said extinction earlier, 16 right? 17 A. Yes. 18 Q. And so how does extinction come into play? 19 A. Extinction is an event that occurs through 20 negative punishment. And so negative punishment is you 21 didn't clean your room, you don't get your allowance, 22 right? And so we will withhold and we continue to 23 withhold and pretty soon that behavior fades away. 24 Q. So suppose my narcotics dog is -- I'm a 25 handler in this hypothetical. Suppose I'm training him</p>
<p style="text-align: right;">Page 87</p> <p>1 A. Yeah, it just feels good. 2 Q. Yeah, okay. 3 A. So some things just feel good. 4 Q. Got it. 5 A. And, actually, they are very important for our 6 detector dogs because we need a dog who thinks sniffing 7 and searching feels good. 8 Q. Okay. 9 A. That's -- that's why we -- that's why we go 10 out and we hunt for dogs that are going to be able to 11 fulfill these expectations on the road by selection 12 testing them and making sure that they have the -- they 13 have the characteristics that will provide that. 14 Q. So the handler has control over some, but not 15 all reinforcing -- reinforcements? 16 A. If a dog begins to do reinforcements that we 17 don't -- on their own, let's say the dog likes to bite 18 and he bites at the find, we don't want to reinforce 19 that -- 20 Q. Got it. 21 A. -- and we will stop the dog. 22 Q. Okay. 23 A. Physically intervene. 24 Q. Okay. 25 A. So, yes, there is some control over that.</p>	<p style="text-align: right;">Page 89</p> <p>1 and his reward for correctly detecting an assigned 2 narcotic is a Kong. 3 Does that make sense so far? 4 A. Common. 5 Q. Okay, common. So your point about extinction 6 is that if he is alerting or indicating on something 7 where there is not an assigned narcotic, I need to 8 extinct and withhold the Kong? 9 A. Correct. 10 Q. Do I have that right? 11 A. Correct. 12 Q. Okay. And the idea is giving him the Kong 13 reinforces the behavior and withholding the Kong 14 discourages the behavior? 15 A. I'm not sure it discourages the behavior. 16 Q. Okay. 17 A. What discourages the behavior is repeated 18 failure. 19 Q. Okay. So I have to repeatedly not give him 20 the Kong so that he learns sitting, or whatever his 21 indication of behavior is, is not going to produce the 22 reward? 23 A. Correct. 24 Q. Got it. And this is like -- this is gambling, 25 right? This is what we talked about earlier where a</p>

<p style="text-align: right;">Page 90</p> <p>1 dog is sort of trying to trick the handler into giving</p> <p>2 over that Kong by displaying an alert or indication of</p> <p>3 behavior, even when he has not done the work?</p> <p>4 A. In general, very early, we extinct that.</p> <p>5 Q. But I described gambling right just now?</p> <p>6 A. Yeah, close enough.</p> <p>7 Q. Okay. Well, you're welcome to tweak it.</p> <p>8 A. Well, I mean, you can get off in the weeds</p> <p>9 with this thing and start talking about dopamine</p> <p>10 production and all that kind of stuff --</p> <p>11 Q. Okay. I'm not going to ask you about that.</p> <p>12 A. -- in humans. So, you know, it is something I</p> <p>13 talk about in my course.</p> <p>14 Q. Okay, got it. I think we've talked about</p> <p>15 proofing a little bit today, but I just want to --</p> <p>16 maybe from the ground up, what is proofing?</p> <p>17 A. Proofing is preventing a dog -- is stopping a</p> <p>18 dog from alerting on unassigned substances.</p> <p>19 Q. Okay. So give me some examples.</p> <p>20 A. I'll give one from my -- from my experience.</p> <p>21 I had a dog early in my career with the county that was</p> <p>22 trained on some seized narcotics out of the prisons.</p> <p>23 And as we found out much, much later, it was mostly --</p> <p>24 it was mostly maltose and milk sugar.</p> <p>25 THE REPORTER: And what?</p>	<p style="text-align: right;">Page 92</p> <p>1 to, you've got to put it in the training area, right?</p> <p>2 A. If it is something we've discovered the dog is</p> <p>3 alerting and indicating to, yes.</p> <p>4 Q. Well, what about -- I mean, there are some</p> <p>5 examples that come to mind as maybe kind of tricky, so</p> <p>6 what about cash, like circulated cash? It strikes me</p> <p>7 that that circulated cash might have residue of</p> <p>8 narcotics on it, right?</p> <p>9 A. Yeah, there's one study out there that's kind</p> <p>10 of bogus, yes.</p> <p>11 Q. Well, either --</p> <p>12 A. You can't wash hundreds of bills and then</p> <p>13 concentrate it down --</p> <p>14 Q. Yeah.</p> <p>15 A. -- and then say, "I found a little bit of</p> <p>16 narcotics and all the money is tainted." That is the</p> <p>17 study that everybody references.</p> <p>18 Q. Well, I guess my question to you is not so</p> <p>19 much about this study, but whether it's a standard</p> <p>20 practice in the narcotics training field to proof</p> <p>21 narcotics dogs against cash?</p> <p>22 A. Yes, under Utah POST standards, it is one of</p> <p>23 the scenarios that we present to dogs.</p> <p>24 Q. You mention Utah, but I assume that's like a</p> <p>25 best practice nationally, right?</p>
<p style="text-align: right;">Page 91</p> <p>1 THE WITNESS: Maltose, milk sugar.</p> <p>2 THE REPORTER: Okay.</p> <p>3 THE WITNESS: And the dog was finding</p> <p>4 chocolate, milk sugar, and we had to go back and stop</p> <p>5 that dog from doing that behavior.</p> <p>6 Q. (BY MR. WINDHAM) Okay. So proofing is a way</p> <p>7 of making sure a dog is not alerting or indicating to</p> <p>8 an unassigned substance?</p> <p>9 A. Correct.</p> <p>10 Q. And how does it actually work in practice?</p> <p>11 How do you proof a dog to not do that?</p> <p>12 A. The ideal methodology would be to use</p> <p>13 extinction.</p> <p>14 Q. Okay. So which is what we just talked about,</p> <p>15 right?</p> <p>16 A. Correct.</p> <p>17 Q. So if -- well, let me back up.</p> <p>18 It sounds like the only way that would</p> <p>19 even work, though, is if the substance you want to make</p> <p>20 sure they are not alerting to is actually somewhere</p> <p>21 around, right?</p> <p>22 A. Yes.</p> <p>23 Q. So when you're doing training for a dog, a</p> <p>24 narcotics dog, you want to make sure that if there is</p> <p>25 something you don't want that dog to alert or indicate</p>	<p style="text-align: right;">Page 93</p> <p>1 A. I'm not sure I've seen it listed out as best</p> <p>2 practice, but it is something that I certainly do and</p> <p>3 many people do.</p> <p>4 Q. At least you believe it's the best practice,</p> <p>5 then?</p> <p>6 A. I believe it's the best practice.</p> <p>7 Q. Okay. So tell me in practice how you would</p> <p>8 proof a dog against cash.</p> <p>9 A. I never let it happen.</p> <p>10 Q. What do you mean?</p> <p>11 A. Early on in training, I put cash out and it</p> <p>12 has no value to the dog and never does.</p> <p>13 Q. Okay. But the point is that it's in the area,</p> <p>14 right?</p> <p>15 A. Sure.</p> <p>16 Q. That's how you know the dog is not alerting or</p> <p>17 indicating to it, right?</p> <p>18 A. Yes.</p> <p>19 Q. And that would be true -- let me just give you</p> <p>20 an example. Suppose there's a training day where dogs</p> <p>21 are sniffing vehicles, right? Would a handler, or</p> <p>22 maybe even like a unit supervisor who is helping</p> <p>23 conduct the training, put cash in cars to be sure the</p> <p>24 dog is not alerting to the cash?</p> <p>25 A. That's not uncommon.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. Okay. What about -- I think we had a little 2 discussion about marijuana earlier and I 3 mentioned hemp. 4 A. Yes. 5 Q. It's on my mind. So for the same plant or 6 leaf, how do you ensure -- how do you proof a dog 7 against hemp? 8 A. There's one study done at Florida 9 International University, which has demonstrated 10 that -- has shown that maybe you can teach a dog the 11 difference between hemp samples and marijuana samples. 12 It is brand new. I just learned about it recently. I 13 sat through a conference in which this was presented. 14 I still have a lot of questions from the practical 15 application side of things as to whether or not this 16 will work on the street. 17 And I think, as an industry, that's where 18 we're all hovering around right now. I think it will 19 be a moot point as soon as it goes from a Schedule I to 20 a Schedule III drug. 21 Q. Do you -- I don't want to get down the rabbit 22 hole on studies. I'm more interested in kind of your 23 view of what the -- what the best practice would be 24 with regard to hemp. So let's say -- Utah or New 25 Mexico, where are you at right now?</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. Do you at least agree that it's important to 2 try to figure that out? 3 A. Like I said, it may become irrelevant. 4 Q. Before that happens, though -- 5 A. Okay. 6 Q. -- I would assume you want the dogs to be 7 doing a good job, right? 8 A. Absolutely. 9 Q. So at least until that kind of national 10 reckoning occurs, do you agree that it's important to 11 proof dogs against hemp? 12 A. At this -- I can't make a judgment on that. 13 We're in an unknown area right now and I don't want to 14 say yes or no to something I don't have enough 15 knowledge of to say, "We should do this or that." 16 Q. Okay. 17 A. I'm waiting. I'm on the edge of my seat with 18 this stuff. 19 Q. Sure. 20 A. I want to know, and that might direct me for 21 some better practices. We will find out. 22 Q. Maybe another way of getting at this is sort 23 of if dogs are not proofed against hemp, it's possible 24 that a dog trained to alert or indicate to marijuana 25 could be detecting hemp, right?</p>
<p style="text-align: right;">Page 95</p> <p>1 A. New Mexico. 2 Q. So let's say in New Mexico, in 2019 when the 3 Farm Bill -- actually, let me back up. 4 Was marijuana illegal in New Mexico 5 in 2019? 6 A. Yes. 7 Q. It was illegal? 8 A. I would have to qualify that. We've had 9 medical marijuana in my state for many years now and I 10 think it was 2021 where it became recreational. 11 Q. Let me make the example simpler, then, because 12 that will make -- it has to be -- it doesn't have to be 13 state specific. 14 So the -- what I'm trying to figure out 15 is in a state where marijuana, recreational marijuana 16 was illegal and then the Farm Bill is passed and hemp 17 becomes legal, what is the best practice in terms of 18 how you would proof a narcotics detection K9 to make 19 sure they are not alerting or indicating to hemp on the 20 streets? 21 A. We're still learning. 22 Q. Okay. So it's just unknown? 23 A. I think we have some ideas, but we don't know 24 whether or not they will translate into practical 25 application yet or not.</p>	<p style="text-align: right;">Page 97</p> <p>1 A. I don't know. I have put hemp buds out during 2 training to see if dogs would indicate on it. I have 3 put hemp oil out and they have not indicated on it. 4 But does that mean all of hemp is that way? I don't 5 know. It's the same plant. 6 Q. Okay. 7 A. Again, we're in a kind of fuzzy area here and 8 I don't have great answers for you. 9 Q. That's okay. So this is just an area where 10 you don't know the answer? 11 A. Right, and I want to know it. 12 Q. Yeah, sure. 13 A. And I'm trying to find out as much as I can 14 about it. 15 Q. Yeah. 16 A. But I haven't developed a decent answer. 17 Q. Okay. Let me just see if I can get like a 18 basic idea here on the table and tell me what your 19 reaction is to it. 20 If you wanted to train a narcotics 21 detection dog to not alert to hemp, I assume you would 22 have to do some kind of proofing, even if we don't know 23 what that looks like yet? 24 A. At this point, if you said, "I have to have a 25 dog on the street that we know will not indicate on</p>

<p style="text-align: right;">Page 98</p> <p>1 hemp under any conditions or any type of hemp," my 2 answer would be "Let's not train it on marijuana at 3 all." 4 Q. Okay, I see. And so in that -- in that 5 situation, if our goal is to make sure the dog is not 6 alerting to hemp, is there any way to un-train a dog 7 who has been trained to alert to marijuana? 8 A. You can do some extinction and then follow it 9 up with some compulsive work. How well it works is 10 very up in the air. You know, in theory, it should 11 work. 12 Q. Okay. 13 A. But we don't know that it's -- it isn't 14 somewhat refractory. Most places, state of Colorado, 15 their Supreme Court said that a dog that's trained on 16 marijuana at any point in time is no longer probable 17 cause. All of those dogs went away. 18 And so in my state, when we went to 19 recreational, the only time that we -- we had a couple 20 of older dogs that we didn't want to get rid of right 21 away in my department, and so what we did there is we 22 said, "Unless we're working under the umbrella of 23 supporting a federal agency, we're not going to deploy 24 our dogs." 25 Q. Okay. And that sounds like it's maybe a trend</p>	<p style="text-align: right;">Page 100</p> <p>1 works where the handler is rewarding a dog and trying 2 to reinforce those behaviors, depends on whether the 3 handler is doing the rewarding correctly? 4 A. Yes. 5 Q. Got it. And then what about training 6 structure? So I think there was a reference earlier to 7 maintenance training. What is that? 8 A. Maintenance training, when we talk about it, 9 often is talked in the context of how much time you 10 should spend training. 11 Q. Uh-huh. 12 A. So depending on which authority you ask, that 13 might be anywhere from four hours to eight hours a week 14 as minimums. At the beginning, it starts out much 15 higher than that when we're -- when we're training the 16 team. 17 But that's generally when people start 18 discussing maintenance training. We're talking about 19 timeframes, but it also is -- and you talked about 20 structure, you will set up things that, in the dog's 21 mind, look like what they would do on the street. 22 Searching a car, searching a house, searching a semi, 23 all of these sorts of things. 24 Q. Just to back up a second, so we have talked 25 about certification a little bit and you mentioned a</p>
<p style="text-align: right;">Page 99</p> <p>1 that's kind of growing nationwide? 2 A. I believe it is. That's been my experience. 3 Q. Okay. In terms of the training system we've 4 been talking about where part of what handlers do is 5 reward dogs to reinforce behaviors they want and 6 withhold rewards to not reinforce behaviors they don't 7 want, are there any drawbacks to that when you're 8 training dogs? 9 A. That's the way they have to understand. Every 10 system works on reinforcement. 11 Q. Okay. So are there any -- I don't know, it 12 sounds like we've talked about a few things that can go 13 wrong. So, I don't know, do you think there's a better 14 system out there for training narcotics detection dogs 15 than one where rewards come from the handler? 16 A. No. 17 Q. Okay. 18 A. Because we have to reinforce behavior. 19 Q. Got it. 20 A. And the only other way would be for them to 21 actually retrieve the substance. 22 Q. Okay. 23 A. And you can see the difficulties up front in 24 always retrieving the substance. 25 Q. Okay. So ultimately, how well the system</p>	<p style="text-align: right;">Page 101</p> <p>1 acronyms of organizations that do certification. One 2 of them is NCATS, right? 3 A. Yes. 4 Q. Which is how Deputy Molina's Max was 5 certified, right? 6 A. Yes. 7 Q. After a dog -- does certification guarantee 8 that a dog will be reliable forever? 9 A. A certification? 10 Q. Yes. 11 A. No. 12 Q. What about two certifications? 13 A. As the dog gains a history and maintains 14 proficiency, I think we can say we've got -- we've got 15 an experienced dog on the street who maintains above 16 the level of failure for a specific certification, so 17 the team tends to get better and better and better over 18 time and then they get old and then they start to slide 19 down. 20 Q. Sure. I guess what I'm wondering is -- I'm 21 going to give you an example that works in my head, and 22 you tell me if it doesn't make sense, but the example I 23 always think about here is getting your car inspected. 24 So you get an annual car inspection, right, I assume 25 you do this?</p>



<p style="text-align: right;">Page 102</p> <p>1 A. Ours is every other year.</p> <p>2 Q. Okay. Well, I get an annual car inspection</p> <p>3 and the car inspection that I get, I don't understand,</p> <p>4 at least, to mean that my car will always be safe; is</p> <p>5 that fair?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And like I could do something to my car</p> <p>8 after it's inspected to make it very unsafe, right?</p> <p>9 A. Sure.</p> <p>10 Q. I could take a tire off, I could do all sorts</p> <p>11 of things to make it a bad car, right? Right?</p> <p>12 A. Yes.</p> <p>13 Q. So is there a similarity with dogs where after</p> <p>14 a dog is certified, the handler could do something in</p> <p>15 the training process, in the deployment process that</p> <p>16 would compromise the reliability of that dog?</p> <p>17 A. I think we could say that about every piece of</p> <p>18 equipment, not just dogs.</p> <p>19 Q. Okay. But the answer is yes?</p> <p>20 A. Sure. I don't know why one would do that,</p> <p>21 but...</p> <p>22 Q. Well, I mean, I don't necessarily think it</p> <p>23 always has to be intentional. We've talked about some</p> <p>24 unintentional ways that handlers might make mistakes in</p> <p>25 rewarding for example, right?</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. But my question is what if the handler</p> <p>2 is doing that?</p> <p>3 A. "What ifs" are hard. If the person wanted to</p> <p>4 go out and make a mess of their dog, I guess they</p> <p>5 could. That's probably my answer.</p> <p>6 Q. And so to make it clear, rewarding a dog as a</p> <p>7 matter of habit for gambling following a certification</p> <p>8 would mess up that dog?</p> <p>9 MR. FRIGERIO: Objection, form.</p> <p>10 THE WITNESS: It would, but the structure</p> <p>11 of training should never allow that to happen.</p> <p>12 Q. (BY MR. WINDHAM) Okay. So tell me how this</p> <p>13 training should be structured to prevent that from</p> <p>14 happening.</p> <p>15 A. Single blind searches.</p> <p>16 Q. I'm sorry?</p> <p>17 A. Single blind searches --</p> <p>18 Q. Okay.</p> <p>19 A. -- that are monitored by somebody else who has</p> <p>20 placed out the aids.</p> <p>21 Q. Okay. This is the maintenance training,</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And so maintenance training, I think</p> <p>25 you said earlier -- tell me if I'm getting this</p>
<p style="text-align: right;">Page 103</p> <p>1 MR. FRIGERIO: Objection, form.</p> <p>2 Q. (BY MR. WINDHAM) You can answer.</p> <p>3 A. I'm not exactly sure what you're getting at</p> <p>4 for the question. Maybe try it another way.</p> <p>5 Q. Yeah, sure. My question is just -- it sounds</p> <p>6 like you're in agreement with me, at least, that a</p> <p>7 handler could do things after a dog is certified that</p> <p>8 would compromise its future reliability, right?</p> <p>9 A. Yes.</p> <p>10 Q. And some of those things might be intentional,</p> <p>11 right, like cuing the dog, for example, right?</p> <p>12 A. Sure.</p> <p>13 Q. And other things might be unintentional, like</p> <p>14 just not training the dog correctly, right?</p> <p>15 A. I would say failure to train at all would be</p> <p>16 the number one reason for that.</p> <p>17 Q. Just failure to train?</p> <p>18 A. Just not training.</p> <p>19 Q. Okay. You gave me -- well, we talked about</p> <p>20 gambling earlier. What if the handler is rewarding</p> <p>21 gambling behavior as a matter of habit after the</p> <p>22 certification is through?</p> <p>23 A. I would hope that the structure of their</p> <p>24 maintenance and remediation training would not allow</p> <p>25 that.</p>	<p style="text-align: right;">Page 105</p> <p>1 wrong -- that the industry standard would be four to</p> <p>2 eight hours a week of maintenance training?</p> <p>3 A. That's generally what people would quote.</p> <p>4 Q. Okay.</p> <p>5 A. I like to -- I like to hit the middle of the</p> <p>6 road, at least six hours.</p> <p>7 Q. What if they are doing like three hours a</p> <p>8 week?</p> <p>9 A. If the dog is proficient at three hours a week</p> <p>10 and they are getting their work done, yeah, that's</p> <p>11 probably fine.</p> <p>12 Q. What if it's -- what if it's less than three</p> <p>13 hours a week?</p> <p>14 A. I would start to -- start asking, you know,</p> <p>15 "Why are you not doing more?"</p> <p>16 Q. Okay. So you would start to be skeptical of a</p> <p>17 dog's maintenance training once they get below three</p> <p>18 hours a week?</p> <p>19 A. Yeah, they start -- you know, it doesn't have</p> <p>20 to be every single week, though. You might have a week</p> <p>21 where you only get an hour in --</p> <p>22 Q. Sure.</p> <p>23 A. -- and then a week later you get six.</p> <p>24 Q. On average?</p> <p>25 A. We're just looking at -- yeah, And, you know,</p>

<p style="text-align: right;">Page 106</p> <p>1 just like people. For to me to stay in shape when I</p> <p>2 was working, I had to run like a rabbit because I was</p> <p>3 slow and fat, but I worked with guys that smoke</p> <p>4 cigarettes and ran circles around me. Every individual</p> <p>5 is a little bit different.</p> <p>6 Q. Okay. That -- just to make sure I'm clear on</p> <p>7 it, though, the best practice that you would like a K9</p> <p>8 department's handlers and dogs to follow would be four</p> <p>9 to eight hours a week of maintenance training?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you mentioned single blind</p> <p>12 placements, right?</p> <p>13 A. Yes.</p> <p>14 Q. For these maintenance training sessions -- how</p> <p>15 do I ask this -- if it's a narcotics detection dog,</p> <p>16 should that time we just talked about be focused on</p> <p>17 narcotics detection?</p> <p>18 A. I'll actually qualify that --</p> <p>19 Q. Okay.</p> <p>20 A. -- because I look at dual purpose dogs and I</p> <p>21 know that Molina's dog is a dual purpose dog.</p> <p>22 Q. Right.</p> <p>23 A. And so we're looking at the big picture.</p> <p>24 Q. Okay. So I'm interested in how much training</p> <p>25 needs to happen as a matter of maintenance for</p>	<p style="text-align: right;">Page 108</p> <p>1 purpose dog, it's -- it's okay to do both purposes in</p> <p>2 one training session. What about obedience training,</p> <p>3 should that also occur during maintenance training?</p> <p>4 A. Oh, yes. It's part and parcel of the work</p> <p>5 that we do.</p> <p>6 Q. Obedience training is?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So it's your view that when you're</p> <p>9 doing maintenance training for a narcotics detection</p> <p>10 dog, it's fine to also train obedience during the same</p> <p>11 session?</p> <p>12 A. Well, they would be compartmentalized.</p> <p>13 Q. How?</p> <p>14 A. We have a scenario for doing narcotics over</p> <p>15 here and we have a scenario for doing obedience over</p> <p>16 here.</p> <p>17 Q. Okay. And for the record, Mr. Sheldahl is</p> <p>18 gesturing at different sides of the room.</p> <p>19 A. Yeah.</p> <p>20 Q. What about the toys that are used as rewards,</p> <p>21 should the obedience toy be different than the</p> <p>22 narcotics toy, or tell me how that works.</p> <p>23 A. I can tell you how I teach.</p> <p>24 Q. Sure.</p> <p>25 A. I teach that the initial phases of doing dual</p>
<p style="text-align: right;">Page 107</p> <p>1 narcotics work, if that question makes sense.</p> <p>2 A. I find it a little bit less --</p> <p>3 Q. Okay.</p> <p>4 A. -- for dual purpose dogs because they are</p> <p>5 doing tracking. And so proficiency with -- we're doing</p> <p>6 scent work, the dog is always working with it, they are</p> <p>7 doing building search for human beings. And so the --</p> <p>8 the reinforcement of searching, hunting is there for</p> <p>9 all exercises.</p> <p>10 Q. Okay.</p> <p>11 A. And then we compartmentalize it, just for --</p> <p>12 for narcotics detection. So using your nose benefits</p> <p>13 using your nose in all contexts.</p> <p>14 Q. Okay.</p> <p>15 A. And so that -- that's the way I see it with</p> <p>16 multipurpose dogs.</p> <p>17 Q. That's helpful. I mean, just to make sure</p> <p>18 that I -- because I think maybe I got a little</p> <p>19 confused. So the -- if it's a dual purpose dog, like</p> <p>20 K9 Max in this case, and one of those purposes is</p> <p>21 narcotics detection, you would say the four to eight</p> <p>22 hours a week, on average, is the industry standard?</p> <p>23 A. Correct.</p> <p>24 Q. Okay, thank you.</p> <p>25 What -- so I understand that for a dual</p>	<p style="text-align: right;">Page 109</p> <p>1 purpose dog work or narcotics dog work or any detection</p> <p>2 work, that your toy for obedience should be different</p> <p>3 than your toy for detection. But once the dog has</p> <p>4 the -- has the foundations down, it doesn't matter.</p> <p>5 Q. Okay. Why is it -- why -- so tell me about</p> <p>6 the foundation first. Why should the toy be different?</p> <p>7 A. Because at that -- at the beginning phases,</p> <p>8 we're using a primary reward system. The dog is</p> <p>9 flushing its -- its prey and that's the way it sees the</p> <p>10 odor. It doesn't make sense at the initial phases for</p> <p>11 this toy, whatever it is, to be in the handler's hand</p> <p>12 because the dog is out manipulating the environment,</p> <p>13 creating a reinforcer itself.</p> <p>14 Q. I'm not sure I get it, but that's probably</p> <p>15 just because I'm slow. So maybe you can help me kind</p> <p>16 of --</p> <p>17 A. Think of it as a bird dog.</p> <p>18 Q. Yeah.</p> <p>19 A. When is the hunter going to have the bird in</p> <p>20 his hand?</p> <p>21 Q. After the hunt is over?</p> <p>22 A. Exactly.</p> <p>23 Q. Yeah.</p> <p>24 A. And -- but who is it that's managing that</p> <p>25 hunt?</p>

<p style="text-align: right;">Page 110</p> <p>1 Q. Well, I would assume it's structured by the --</p> <p>2 by the owner.</p> <p>3 A. No, we just show up at the hunting grounds.</p> <p>4 Who does the hunting?</p> <p>5 Q. I guess the dog does the hunting.</p> <p>6 A. Yeah.</p> <p>7 Q. Okay.</p> <p>8 A. So that's the initial phases. That's how it</p> <p>9 works until the dog has an understanding of what their</p> <p>10 task is. And then once they have that down and they</p> <p>11 are solid with that, then the reinforcer can be -- I</p> <p>12 could use a piece of food.</p> <p>13 Q. Okay.</p> <p>14 A. It doesn't matter.</p> <p>15 Q. If -- I'm thinking about a scenario where a</p> <p>16 dog is trained at the foundational level, right, what</p> <p>17 we've been talking about, to sit and do other obedience</p> <p>18 tasks with one toy and then to detect drugs with</p> <p>19 another toy, say the other toy is a Kong. Is that</p> <p>20 fair?</p> <p>21 A. Okay.</p> <p>22 Q. And then eventually, the dog graduates from</p> <p>23 that foundation stage and they shift into the "I'm on</p> <p>24 the streets" stage, right? Does that make sense?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 112</p> <p>1 training, right, so whether it's narcotics or</p> <p>2 obedience, suppose a handler is going to the same</p> <p>3 location over and over again for trainings, how is the</p> <p>4 dog supposed to know on a given day, "We're doing</p> <p>5 narcotics versus we're doing obedience today"?</p> <p>6 A. Rituals.</p> <p>7 Q. Okay, that's helpful. So at least in</p> <p>8 training, there should be a separate ritual for the</p> <p>9 same location?</p> <p>10 A. Even -- even if they don't call it a ritual,</p> <p>11 even if they don't know they are doing a ritual,</p> <p>12 handlers behave different when they prepare for</p> <p>13 narcotics and the dog sees that and they prepare</p> <p>14 different when they get ready for obedience.</p> <p>15 Q. Okay. So as long as there is a difference in</p> <p>16 the way a handler behaves for obedience versus</p> <p>17 narcotics detection in training, that's enough to tell</p> <p>18 the dog, "We're doing one versus the other"?</p> <p>19 A. Yeah, it's the dog's perception.</p> <p>20 Q. And would the same be true out in the field</p> <p>21 for deployments on -- like in this case, a deployment</p> <p>22 on a car?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. What if a handler's standard approach</p> <p>25 when they arrive on a scene is to do the exact same</p>
<p style="text-align: right;">Page 111</p> <p>1 Q. So what is the handler supposed to do at that</p> <p>2 point with the toys and their rewards?</p> <p>3 A. I don't think it makes a lot of difference at</p> <p>4 that point. The dog knows, "Hey, we're going to do a</p> <p>5 narcotics search, this is my behavior." The dog knows,</p> <p>6 "I was just told to sit or heel and this is my set of</p> <p>7 behaviors."</p> <p>8 Q. The -- I guess I'm not getting how a dog knows</p> <p>9 which it's doing, and maybe that has to do with rituals</p> <p>10 and maybe it doesn't. So maybe you can help me get a</p> <p>11 grasp on that.</p> <p>12 A. Rituals and body language in relationships.</p> <p>13 Q. Okay.</p> <p>14 A. So we create a ritual that says, "We're going</p> <p>15 to go do a sniff." Tracking -- this might -- this is</p> <p>16 probably more clear-cut. So in tracking, the dog has</p> <p>17 to take us down an area following the trail of a</p> <p>18 person, usually at the end of a 30-foot leash, totally</p> <p>19 independently. That's what we're doing in the</p> <p>20 narcotics, the beginning phase.</p> <p>21 And -- but just like in tracking, get to</p> <p>22 the person, throw them a ball. They are not focused on</p> <p>23 what the handler's doing, they are focused on the end</p> <p>24 task. Get to the person at the end of the track.</p> <p>25 Q. Okay. In a situation where you're doing</p>	<p style="text-align: right;">Page 113</p> <p>1 thing with the dog, whether they are getting out and</p> <p>2 doing obedience training on the street or getting out</p> <p>3 to deploy the dog on a car?</p> <p>4 A. I'm not sure how you -- how they could be the</p> <p>5 same.</p> <p>6 Q. I see what you're saying.</p> <p>7 A. They are -- they are different tasks and the</p> <p>8 the handler is focused on one or the other.</p> <p>9 Q. Okay.</p> <p>10 A. And dogs have an amazing ability to figure out</p> <p>11 what we're doing.</p> <p>12 Q. Is it basically just if the dog sees the car,</p> <p>13 the dog knows --</p> <p>14 A. Some of it -- particularly on dogs that are</p> <p>15 just single purpose interdiction dogs, they know</p> <p>16 exactly what -- they are looking at the car as you get</p> <p>17 them out -- out of the vehicle.</p> <p>18 Q. Okay.</p> <p>19 A. They know why they are there.</p> <p>20 Q. Okay.</p> <p>21 A. It may be a little less dramatic, and that's</p> <p>22 why we use rituals, with a multipurpose dog.</p> <p>23 Q. I see.</p> <p>24 A. Because he might be getting out of the car and</p> <p>25 going to go do a track of the person who fled from it.</p>

<p style="text-align: right;">Page 114</p> <p>1 Q. Okay, that's helpful.</p> <p>2 MR. BARRON: Hey, Josh.</p> <p>3 MR. WINDHAM: Yeah.</p> <p>4 MR. BARRON: I'm just trying to get</p> <p>5 clarification on my end. Are we going to take an hour</p> <p>6 break for lunch or are we going to push through?</p> <p>7 MR. WINDHAM: What time is our lunch</p> <p>8 coming?</p> <p>9 MS. HEBERT: Somewhere around 12:10</p> <p>10 to 12:30.</p> <p>11 MR. WINDHAM: Okay. What time is it</p> <p>12 right now?</p> <p>13 MS. HEBERT: It is 11:49.</p> <p>14 MR. WINDHAM: Yeah, can you hold on for</p> <p>15 30 minutes, Steve, and then we will break for lunch?</p> <p>16 MR. BARRON: Yeah, no worries. I'm just</p> <p>17 trying to figure out scheduling.</p> <p>18 MR. WINDHAM: Yeah. Does that work for</p> <p>19 people? Okay.</p> <p>20 Q. (BY MR. WINDHAM) Okay. So in terms of -- I</p> <p>21 just want to ask you a little bit about the structure</p> <p>22 of kind of the K9 unit hierarchy as a general matter.</p> <p>23 Does that -- do you know what I'm asking</p> <p>24 about?</p> <p>25 A. The policy? I mean --</p>	<p style="text-align: right;">Page 116</p> <p>1 I work with a lot of smaller departments around the</p> <p>2 country, they often -- whoever the supervisor is on</p> <p>3 duty is the supervisor for the guy with the dog.</p> <p>4 Often, they have one, maybe two dogs, and they don't</p> <p>5 have a separate unit and a separate supervisor for</p> <p>6 that. They just don't have the manpower for that kind</p> <p>7 of stuff.</p> <p>8 Q. Okay. What -- if there is such a thing as a</p> <p>9 best practice in this area, what would be the best</p> <p>10 practice for the qualifications to be the supervisor of</p> <p>11 a K9 unit?</p> <p>12 A. You're asking somebody who thinks that I</p> <p>13 should be educating them, so I'm going to give you the</p> <p>14 answer that I think should be here and I don't know</p> <p>15 that it's there, I don't think it is there.</p> <p>16 Every single supervisor should go through</p> <p>17 a K9 unit supervising course, every single one of them</p> <p>18 should, and that should be something you do once you're</p> <p>19 appointed to that position. In a department that has a</p> <p>20 lot of people in it, that -- that supervisor should</p> <p>21 also be a dog handler.</p> <p>22 Q. Okay.</p> <p>23 A. Or have been a dog handler. It's really</p> <p>24 difficult to understand the difficulties and the effort</p> <p>25 that goes into being a dog handler if you don't have a</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. Not Bexar County specifically. I just want to</p> <p>2 know, in your experience in this field, you have been</p> <p>3 doing this for a very long time, kind of some of the</p> <p>4 best practices about the way that a K9 unit would be</p> <p>5 overseen and managed, if that makes sense.</p> <p>6 A. Yeah, I can make some generalizations.</p> <p>7 Q. That's all I -- that's all I'm asking about.</p> <p>8 So, generally speaking, is your</p> <p>9 experience that a K9 unit would have is a supervisor</p> <p>10 and a trainer on it?</p> <p>11 A. Depending on the size of the program.</p> <p>12 Q. Okay.</p> <p>13 A. And I'm going to reflect back to what -- to</p> <p>14 what I did.</p> <p>15 Q. Sure.</p> <p>16 A. We had a K9 supervisor from the time I started</p> <p>17 and we had one -- always had one and the program still</p> <p>18 has one. That K9 supervisor is a sergeant and they</p> <p>19 answer -- today, they answer to the special operations</p> <p>20 division lieutenant and captain. And I think that's</p> <p>21 fairly similar for a department this size. I don't</p> <p>22 know how big Bexar County is deputy-wise. My -- my</p> <p>23 department now is like 330 or 340 deputies. That</p> <p>24 doesn't include the jail.</p> <p>25 So I think that smaller departments, and</p>	<p style="text-align: right;">Page 117</p> <p>1 direct connection to it.</p> <p>2 Q. Okay.</p> <p>3 A. Unfortunately, it's not possible in all</p> <p>4 departments.</p> <p>5 Q. For a department that has the resources to do</p> <p>6 it, what would your reaction be if a department had a</p> <p>7 K9 unit supervisor that had no experience as a handler?</p> <p>8 A. They should go through, at a minimum, a K9</p> <p>9 unit supervisor course.</p> <p>10 Q. What -- what kind of downstream problems might</p> <p>11 arise if there's a K9 unit supervisor that just doesn't</p> <p>12 have any experience with dogs?</p> <p>13 A. Not understanding the job. If you haven't</p> <p>14 done it, it's difficult to understand it. And also, if</p> <p>15 they are in a role where they have to make decisions --</p> <p>16 and this is less important about narcotics, but on the</p> <p>17 patrol side, you know, you need to understand the law,</p> <p>18 understand the training, particularly when it comes to</p> <p>19 uses of force.</p> <p>20 Q. Okay.</p> <p>21 A. So the big picture for me, beyond just</p> <p>22 narcotics, is we need somebody who really has some</p> <p>23 education so decisions are being made that are correct.</p> <p>24 Q. Would that all encompass knowing how to</p> <p>25 actually do proper oversight of the handlers?</p>

<p style="text-align: right;">Page 118</p> <p>1 A. That would -- that is something that would be 2 covered in any K9 supervisor course I've seen. 3 Q. So it's just -- it's possible that somebody 4 who is a K9 unit supervisor who hasn't had any of that 5 training and has no background as a handler just isn't 6 go to know how to properly oversee the handlers? 7 A. They probably know how to oversee deputies or 8 officers, but they don't know anything about the inner 9 workings of a K9 program. That makes sometimes 10 decisions that aren't in the best interest of the 11 department. 12 Q. They might not know, for example, how often 13 dogs should be certified, right? 14 A. How they should be certified, how much they 15 should train. And I'll tell you, this -- I'm very 16 vocal about this particular issue, is that it's the rob 17 Peter to pay Paul syndrome. "Yeah, I know it's K9 18 training day, but I need you to go take this class over 19 at human resources. You've got to have that done, so 20 just do it that day and skip training." 21 Q. Got it. 22 A. That is -- that is a syndrome that I see when 23 supervisors are not properly trained, that K9 training 24 is -- is sacred. You do it. You must. 25 Q. And the syndrome is that if the handler --</p>	<p style="text-align: right;">Page 120</p> <p>1 what an A is, we know what a B is. 2 Q. Sure. 3 A. You know, so we can look at that and say, "All 4 right, this dog -- this dog is an F." 5 Q. Should a -- should a K9 unit supervisor know 6 to actively review those records? 7 A. Yeah, I don't -- frankly, industrywide, it's 8 probably not done as much as -- because I'm so steeped 9 in this industry, that I would like to see it. I know 10 it doesn't get done. The most important thing is that 11 the records are produced. 12 Q. Okay. 13 A. And the handler does -- does a diligent job of 14 doing that. 15 Q. And why is it important that the records be 16 produced? 17 A. The reason we do records is so that we can 18 look back and determine where we have to focus our 19 maintenance and remediation training. 20 Q. Okay. 21 A. Unfortunately, this is lost in the industry 22 these days. You guys are the problem. I'm serious. 23 You're the problem. 24 Q. You mean the lawyers? 25 A. We're going to look at this and we're going to</p>
<p style="text-align: right;">Page 119</p> <p>1 sorry, if the supervisor isn't properly trained or 2 qualified, they are just not going to know -- 3 A. Training is training. I'm sending you to 4 different training today, but it's training. 5 Q. So my question is the handler is just not 6 going to know how important the training is, right? 7 A. Well, the supervisor is not going to know. 8 Q. I'm sorry, that's what I meant. The 9 supervisor is not going to know how important the 10 training is? 11 A. Correct. 12 Q. And when it should be done, right? 13 A. Correct. 14 Q. And the proper frequency of training, how long 15 it should take, that kind of thing? 16 A. Correct. 17 Q. What it should involve, right? 18 A. Correct. 19 Q. And the handler -- I keep saying handler -- 20 and the supervisor might not also know what to look for 21 in the records of these teams, right, in terms of how 22 to assess the reliability? 23 A. I'm not sure about that. That's -- I think 24 you could look at records and you can kind of get a 25 quick determination. We all know about grades, we know</p>	<p style="text-align: right;">Page 121</p> <p>1 make a chart. That's really unimportant to me because 2 that chart, over time, may look wonderful and I may 3 have seen something really bad two weeks earlier on 4 that dog and it's reflected somewhere and I need -- I 5 need to know how to do that. That's the purpose. 6 And, unfortunately, we inherited this 7 kind of recordkeeping from the military. That's where 8 the initial stuff on dog training came from was the 9 military, and the purpose of K9 training records in the 10 military was controlling personnel. 11 Q. I'm a little confused on one thing because I 12 think you said at the beginning of that discussion that 13 the purpose of having these records is so that you can 14 know where to focus the training and maintenance, 15 right? 16 A. Correct. 17 Q. So I can't tell whether you think the records 18 are important or unimportant. 19 A. They are important, but they have been 20 co-opted into looking at them in this global manner. 21 What happened a year ago means nothing. 22 Q. Uh-huh. 23 A. I wish we could just toss all of that stuff 24 out because it really doesn't mean anything. Keep the 25 certification record, that's it, and let's move on,</p>

<p style="text-align: right;">Page 122</p> <p>1 because what a dog's performance was a year ago has 2 very little to do about -- with what it is today. 3 Q. Let me see if I'm getting this. Would it be 4 fair to say that it's more useful to you, as the person 5 assessing whether dogs are reliable on a team, to look 6 at recent records as opposed to old records? 7 A. Absolutely. 8 Q. Okay. And you mentioned charts a second ago, 9 like making charts. 10 A. I see people collect numbers, make charts and 11 pie charts and we even have electronic programs now 12 that many people utilize that, you know, keep things in 13 a cloud and you can generate a pie chart in 30 seconds 14 off of everything your dog has done. It looks really 15 nice, but it's not very useful, to be honest, but it's 16 something we -- as an industry, we have really gotten 17 into. 18 Q. Would it be at least -- I'm trying to kind of 19 get -- I feel like you're saying a few different things 20 here. 21 Would it be more useful to have a program 22 that runs those numbers, make those charts, makes those 23 pie charts if you're focusing on the recent behavior of 24 the dog as opposed to like years ago? 25 A. Yeah, I want to know what's happening right</p>	<p style="text-align: right;">Page 124</p> <p>1 A. I looked mostly at the most recent ones that I 2 was provided to see where the dog was. 3 Q. By most recent, do you mean like records 4 from -- 5 A. The last couple of months. I flipped through 6 all of them to see if there is anything glaring out 7 there that I needed to know about, and there was 8 nothing. 9 Q. The last couple of months in 2024 or '23? 10 A. Whenever it was provided. 11 Q. So, in other words, whatever document you were 12 provided, you looked at the last few months and kind of 13 focused on that? 14 A. Yes. 15 Q. Okay. And so if the records went from 2021 16 through 2023 you would have looked at like the last few 17 months of 2023? 18 A. I looked at all of them, but I really focused 19 on the more recent ones. 20 Q. Okay. In terms of doing that ballpark 21 calculation -- 22 A. Yes. 23 Q. -- that you were just talking about? 24 A. Yes. 25 Q. Okay. We were talking about K9 unit</p>
<p style="text-align: right;">Page 123</p> <p>1 now. So if I -- I'll give you an example. If I went 2 out with my assigned long gun, whatever that might be, 3 for me it was an M4, and I went out and we had to 4 maintain 90 percent on our qualifications and I shot 5 96, 98 percent every time, but then the last month I'm 6 shooting 70s, does it matter that I -- that I was doing 7 96 percent two years ago? No, what matters is right 8 now. 9 Q. Okay. 10 A. And we have to fix it. 11 Q. Got it. The -- I'm stuck on this thing of 12 charts. Did you make any kind of charts or pie graphs 13 or anything like that with Molina's records when you 14 were -- 15 A. No. 16 Q. -- when you were producing this report? 17 A. No. 18 Q. Okay. Did you run any kind of numbers at all? 19 A. Only in a rough manner. 20 Q. What do you mean? 21 A. I went through -- flipping through all of this 22 stuff seeing where is the failure, where is the 23 failure, and they were rare. 24 Q. Okay. So you just kind of thumbed through and 25 ballparked it?</p>	<p style="text-align: right;">Page 125</p> <p>1 supervisors reviewing records a second ago. Do you 2 also think that a K9 unit supervisor ought to review 3 body cam footage? 4 A. I think if there's any arrest made or there's 5 any complaint made, then there probably should be a 6 review of the body cam footage. 7 Q. Okay. 8 A. I don't think that it's a good use of time 9 just to hit body cam stuff over and over and over 10 again. And I'll give you some context to that. 11 I was in the sheriff's department, which 12 is the metro area of Albuquerque; the city of 13 Albuquerque has been under DOJ thumb for a long time 14 and they have this gigantic amount of manpower 15 reviewing body cam stuff all the time and crime is 16 still going up. Maybe we need those people out doing 17 some other things. 18 Q. Sure. 19 A. That's just a personal -- you know, that's 20 just a personal opinion. And I moved out of 21 Albuquerque because it ain't getting better. It just 22 seems to me we were focusing on the wrong thing. 23 Q. You mentioned reviewing arrest cases, right? 24 A. Yes. 25 Q. So, as an example, if somebody -- say somebody</p>



<p style="text-align: right;">Page 126</p> <p>1 is pulled over, a traffic stop like this case, dog 2 alerts or indicates on the car, the car is searched, 3 drugs are found, that person is arrested. 4 That's an example of a situation where 5 you would say the K9 unit supervisor should review the 6 body cam footage? 7 A. Yeah, I think the K9 unit should -- should 8 look after itself and the initiating officer should 9 be -- should have body cam footage looked at also. 10 Q. Okay. But the -- what I'm getting at is just 11 kind of how a K9 unit supervisor goes about doing his 12 oversight duties, if that makes sense. 13 A. That could be part of it. 14 Q. Okay. And so -- but the -- it seems like the 15 goal of this, and tell me if I'm off base, the goal of 16 reviewing training records, deployment records, body 17 cam footage would be to ensure that the dogs that are 18 out there in the field are reliable, right? 19 A. That is a portion of it. 20 Q. The handlers are reliably handling the dogs, 21 too? 22 A. Correct. 23 Q. Okay. And if that oversight is performed and 24 a supervisor determines that a dog is not reliable or a 25 handler is not reliable, what's the proper protocol in</p>	<p style="text-align: right;">Page 128</p> <p>1 field, and the K9 unit supervisor reviews their records 2 and their body cam footage and they determine, "Man, 3 this handler is -- has a habit of rewarding gambling 4 behavior," right? 5 A. I'm not sure how we determine that on a 6 body-worn camera. 7 Q. Well, suppose it's from the records and from 8 interviewing the officer as well. 9 A. I think there's so much speculation there, 10 that would be something you might see in training. And 11 if there -- things are dramatically different in 12 deployment versus training, you would address it to do 13 it the same as we've practiced. 14 (Discussion off the record) 15 Q. (BY MR. WINDHAM) Mr. Sheldahl, we're back on 16 the record. Do you recognize you are still under oath? 17 A. Yes. 18 Q. Great. Okay. So in terms of the K9 unit 19 supervisor and their duties to review records and body 20 cam footage to ensure the reliability of K9 teams, are 21 you following this thread? 22 A. Yes. 23 Q. Okay. In terms of that topic, what if they 24 conducted that kind of oversight and set aside 25 gambling, identified a team where the dog had a false</p>
<p style="text-align: right;">Page 127</p> <p>1 that situation? 2 A. First one is to do some remediation. 3 Q. Okay. 4 A. Identify the problem, go deal with it and then 5 look to see if it was remediated. 6 Q. If the problem is the sort of problem that 7 would compromise the team's reliability, would that 8 remediation involve taking a little time away from 9 being on the streets to fix the problem before they go 10 back? 11 A. If it was quite serious -- and, you know, I 12 don't see it -- again, Deputy Molina's dog is a dual 13 purpose dog where I would see that as being -- we're 14 pulling the dog, would be something that was a safety 15 problem. Most other things don't need to be that 16 dramatic, although you might say, "Look, you know, 17 you're off call this week for narcotics stuff. 18 Let's -- let's do some more training. While you're on 19 duty, let's do some more training." 20 Q. Well, you mentioned Deputy Molina. And one 21 thought I have is if -- talking about K9 unit 22 supervision and how that ought to go, if -- let's take 23 Molina out of it because I don't want to poison the 24 well on the question here. 25 Just a hypothetical dog out there in the</p>	<p style="text-align: right;">Page 129</p> <p>1 positive rate that fell above -- at or above that 20 2 percent threshold we talked about? 3 A. So, first, what I'm going to say is that you 4 could look at a dog team and say, "We have a suspected 5 false positive." 6 Q. Okay. 7 A. In the real world, it's very hard to say, 8 "This is a false positive," because we live in a world 9 full of substances that -- that's why we do this. So 10 the odors that are there -- and the dog doesn't know 11 substance from odor, can't tell the difference. 12 And so if there is odor there, the dog 13 may have provided us with an alert and indication and 14 we find nothing or we find nothing that's chargeable. 15 So that might -- we don't -- I call that -- I don't 16 call that a false positive. Unsubstantiated is the 17 word that I use. 18 Q. Okay. 19 A. And so, yeah, if we start seeing all of these 20 unsubstantiateds, we have to get suspicious. We don't 21 make a decision, this dog is right or this dog is 22 wrong. So then we have to go into our maintenance 23 training and say, you know, "We're going to set up some 24 scenarios that look just like these. We're going to 25 stop some cars on the interstate, we're going to stop</p>

<p style="text-align: right;">Page 130</p> <p>1 some cars in the neighborhoods and we're going to set 2 it up and we're going to make sure we know that these 3 cars are clean." 4 Q. Okay. 5 A. "We're going to go get them from our inventory 6 and set those up and make -- and then find out if 7 that's happening." 8 Q. Okay, that's helpful. So -- and I don't mean 9 to use the wrong term for this, so unsubstantiated is a 10 helpful way to put that. 11 So if a K9 unit supervisor reviews all of 12 the records we've been talking about and starts to 13 suspect that there are a lot of these unsubstantiated 14 alerts and indications, that's an example of a 15 situation where their duty would be to step in, work 16 with the team to do some remediation and then send it 17 back out into the field? 18 A. Correct. 19 Q. Thank you. And then one last question on this 20 line and I promise I'll let you have lunch. 21 The -- earlier we got into rewarding dogs 22 and talking about kind of how that works. We talked 23 about how, you know, a handler might reward a dog with 24 a Kong if the dog is trained to use a Kong to detect 25 narcotics, right?</p>	<p style="text-align: right;">Page 132</p> <p>1 they gamble is alert. It's an intrinsic behavior. So 2 a good dog handler goes, "You're lying to me." And 3 they see that behavior and they don't reinforce it and 4 that's why the team has to be tested together and 5 trained together. 6 Q. So you gave me examples of what different -- 7 bring ten handlers in a room, what they might say. I'm 8 interested in your opinion about this. 9 So if you watched a bunch of body cam 10 footage of a K9 handler and his dog and your 11 observation was that the dog -- I keep getting alert 12 and indication confused. 13 A. That's because you're going to see that 14 with -- my vocabulary is not the same as Deputy 15 Molina's vocabulary. 16 Q. Right. 17 A. And I know that causes problems and 18 unfortunately it's a -- it's a thing in the industry. 19 Q. Well, let me just do it this way. I mean, K9 20 Max was trained -- his -- his conditioned response to 21 detecting narcotics in a car was to sit, right? 22 A. No, his conditioned response initially is 23 the -- is what I call an alert, Molina calls a change. 24 Q. Sure. 25 A. Okay. And that is -- it's very important,</p>
<p style="text-align: right;">Page 131</p> <p>1 A. Okay. 2 Q. Okay. So if the K9 unit supervisor is 3 reviewing body cam from a handler and observes that the 4 handler has a habit of rewarding the dog for the sniff 5 before he confirms whether there is anything illegal in 6 the car, what would be the proper course there? 7 A. Industrywide, you're going to find multiple 8 answers. And you put, in a room like this, ten 9 instructors, you're going to get multiple answers. 10 On one hand, "Hey, the dog is high 11 percentage. If we -- the dog is good and high 12 percentage in all of its work, just reinforce it on the 13 street." Another group will say, "No, don't reinforce 14 it until you can confirm." Both are not incorrect. 15 So if I never reinforce on the street 16 ever, there is a likelihood we begin to enter 17 extinction and the dog goes, "When you call me out and 18 we show up at this traffic stop, I never get 19 reinforced, so I'm just not going to try, I'm done." 20 On the other hand, if you have a dog 21 whose percentage is going down, in other words, they 22 are trying to gamble, maybe, and you keep reinforcing 23 that, you could start to have a dog who is doing the 24 wrong things. 25 Now, one thing that they can't do when</p>	<p style="text-align: right;">Page 133</p> <p>1 remember the timeline. We have to see some degree of 2 an alert change before we see an indication. If we see 3 an indication without -- and it might be very brief. 4 That's why handlers have to be astute. We have to see 5 that change or that alert and then followed by an 6 indication. 7 Q. Okay. 8 A. And so the dog that's gambling deletes the 9 alert because he can't have it. That's classically 10 conditioned. He can't fake it. 11 Q. Okay. In terms of the indication, right, it 12 sounds like Max here -- so his alert was change of 13 behavior, right? 14 A. Alert is a change of behavior, correct. 15 Q. And then -- and then here, his indication 16 would have been sitting, right? 17 A. That's what he did. 18 Q. Okay, thank you. 19 So my question is if you were watching a 20 bunch of body cam footage, say it was of Max, and the 21 pattern with Deputy Molina and Max was that any time 22 Max was deployed on a car, he sat and Deputy Molina 23 gave him the Kong immediately without confirming 24 whether there were any drugs in the car. If that's 25 what you observed, what would you do?</p>

<p style="text-align: right;">Page 134</p> <p>1 A. I would look at whether or not this dog had  2 been reliable and was continuing to be reliable during  3 our training. I would set up scenarios which looked  4 like what I had been observing and see if all of the  5 elements are there. If all of the elements are there  6 on that timeline, it's not a problem. If we're missing  7 elements, it can become a problem.  8 Q. Okay. So you would basically, at that point,  9 start to do some further investigation?  10 A. Yeah, particularly in my role because now  11 that's the only role I have is looking at teams,  12 evaluating teams, supporting teams, remediating teams,  13 training basic instruction and training dogs.  14 Q. Okay.  15 A. That's all I do. So maybe I'm a little bit  16 hyper-focused in the way this goes, but that's my job.  17 Q. Okay. I think that's all I have for right now  18 before lunch.  19 THE REPORTER: Okay. Off the record.  20 (Lunch recess from 12:14 p.m. to  21 1:21 p.m.)  22 Q. (BY MR. WINDHAM) We're back on the record  23 after lunch, Mr. Sheldahl. Do you recognize you are  24 still under oath?  25 A. Yes.</p>	<p style="text-align: right;">Page 136</p> <p>1 boxes?" That's about it.  2 Q. So then one of the goals would be to --  3 A. Yes.  4 Q. -- review those materials to ensure  5 reliability?  6 A. Correct.  7 Q. And that's a proactive process, right; it's  8 not a reactive process?  9 A. It's pretty reactive, in my experience.  10 Q. What do you mean?  11 A. Records get done when they get done and a  12 number of times, that -- "Oh, I've got to catch up on  13 records." I'm sure it's the same for the supervisor.  14 Although I was never a sergeant, I was involved in  15 training and looking at records quite a bit from the  16 dog trainer perspective.  17 A lot of it for them is -- you know, it's  18 very reactive. "All right, guys, it's the end of the  19 quarter, I need to see your records," if that.  20 Q. Well, okay, so it depends on how we're using  21 the words "proactive" and "reactive" then. I guess my  22 question was sort of aimed to get at the issue of  23 should a K9 unit handler have a protocol in place for  24 reviewing those records on a regular basis?  25 A. You know, that's a policy issue and, you know,</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. Great. I wanted to ask just a few follow-up  2 questions to make sure I understood our conversation  3 earlier about K9 unit supervision, and we were talking  4 about unit supervisors reviewing some records and  5 videos.  6 Do you remember that conversation?  7 A. Yes.  8 Q. Okay. That's essentially the process of  9 auditing the team, right, to make sure that the  10 handlers and dogs are doing well?  11 A. It's making sure they are producing the  12 information you ask them to.  13 Q. Right. And the goal in receiving that  14 information is to review it to make sure that the teams  15 are reliable, right?  16 A. I think there's a lot more to it than --  17 Q. Sure.  18 A. -- just simply that.  19 Q. Yeah, go ahead.  20 A. You know, you're keeping track of your  21 personnel, are doing what they are supposed to do, are  22 they maintaining their records. You know, it's not  23 simply about that, particularly the supervisor position  24 in which they are not a trainer. The supervisor is  25 going to go, "All right, did we check all of the</p>	<p style="text-align: right;">Page 137</p> <p>1 I can tell you that it's done so many different ways  2 nowadays. Some people are -- you know, they -- I just  3 had this conversation last week with one of our  4 handlers, which I thought was really excellent. We had  5 done some -- a couple exercises, he went back to his  6 vehicle, sat down at his computer and was doing the --  7 his work on there. Unusual. It usually gets done  8 later when they get a chance. When I'm not so darn  9 busy with other reports is when these things get done.  10 I would like to say they are a super high priority, but  11 they are not that high of a priority. Got other things  12 to do.  13 Q. Okay. Now, all I'm really getting at is  14 whether it's something that a K9 unit supervisor ought  15 to do with some degree of frequency, regardless if it's  16 every week or every month, or whatever, I just want to  17 know if it's something that they ought to do.  18 A. In theory, it should be more than checking the  19 box. It mostly probably isn't in most -- most  20 departments.  21 Q. What about if you're the K9 unit trainer, do  22 you have a duty to be more kind of actively engaged in  23 that kind of stuff?  24 A. You should be there and it should be your  25 eyes. That's what's most important. Not a -- not a</p>

<p style="text-align: right;">Page 138</p> <p>1 form. A form doesn't give you all of the information  2 that your senses are going to give you. So anybody who  3 is doing dog training needs to be able to understand  4 the body language and the actions of dogs and be able  5 to observe handlers. And so the most important thing  6 is developing training exercises and observing them.  7 That's the most important by leaps and bounds.  8 We are very record-bound organizations  9 and people want to see records, but sometimes they  10 don't show you -- I mean, it would be kind of nice if I  11 had like a 360-degree camera setup on every single  12 training exercise that someone did and you could  13 just -- you could just move through them rapidly and  14 go, "This is the one I need to look at," but it's just  15 not -- the technology, maybe someday it will be there,  16 but it's not right now.  17 Q. Okay. Let me just ask it this way. In your  18 view, what is the best practice for a K9 unit  19 supervisor in terms of ensuring that records are  20 reviewed?  21 A. I think there's a couple of -- so records with  22 respect to training -- training I think are kind of  23 secondary things. There you need communication with  24 whoever is involved in your training, which would be  25 the supervisor and the trainer and the handler. There</p>	<p style="text-align: right;">Page 140</p> <p>1 units, too, even if they have --  2 A. I think what it does show is that you're doing  3 training and that you're checking the boxes. Did we do  4 some diversions or distractions, did we hit cars or are  5 the only things we're hitting cars, which might be  6 applicable if the only thing you do is sniff cars, or  7 did we do some buildings, did we do some commercial  8 vehicles.  9 You know, particularly when you're doing  10 lots of different types of dogs, like explosive dogs,  11 are we doing venues because you're going to be sniffing  12 venues. So that is probably the biggest value is are  13 we hitting the training categories that we feel are  14 important for our job.  15 Q. Gotcha. And the issue of -- we talked earlier  16 about false positives and the other term was -- let me  17 just get it right. I don't want to put words in your  18 mouth.  19 A. I'll help you. Unsubstantiated.  20 Q. No, I think it was something different than  21 that. Well, let's with that. Let's go with false  22 alert and unsubstantiated.  23 Are those the kinds of things as well  24 that if you had records over time, as a K9 unit  25 supervisor, you could kind of track that and identify</p>
<p style="text-align: right;">Page 139</p> <p>1 needs to be communication.  2 So the trainer, you can say, "Look, you  3 know, George is having some struggles. We need to  4 focus on this for a little bit. We need to really  5 shift our training over this way until -- until the dog  6 and the team resolve it." So I think that is more  7 important than even a records review. Like I said,  8 there's checking the boxes and then there's stuff  9 that's really actionable.  10 Q. Sure. Does doing that record review allow a  11 K9 unit supervisor to identify problems that may exist  12 in the training or deployments?  13 A. Yeah, particularly in extremely large  14 departments, I can see where -- where the supervisor  15 may have very little contact with the actual team. You  16 know, I can imagine something as big as like the Border  17 Patrol's K9 program, somebody has got to be looking at  18 numbers. And you use the numbers to basically go back  19 down the chain and say, "Look, I got some bad numbers  20 on -- out of this sector, maybe, bad numbers out of  21 this team, go find out why."  22 So in a big organization, I think it has  23 much more value than a smaller organization where you  24 have contact very frequently.  25 Q. Do the numbers have value in the smaller</p>	<p style="text-align: right;">Page 141</p> <p>1 issues?  2 A. Yeah, you -- you could take a look at how many  3 times that you had an alert indication in which there  4 was no -- nothing to confirm or substantiate that alert  5 and indication.  6 Q. Okay.  7 A. And you can see it's -- it's going to happen.  8 That's all there is to it. And it's -- if it became a  9 big number, I would then basically go to whoever is in  10 charge of training and say, "We need to look at this."  11 In some big organization, you might say, "Run that  12 person through a certification again, run it through  13 again."  14 Q. Gotcha. If they weren't meeting whatever  15 thresholds you thought were proper?  16 A. Well, if it just looked -- the numbers looked  17 askew.  18 Q. Okay.  19 A. You say, "Look, let's run through a  20 certification and make sure the trainer is there  21 observing and let's see if we really do have a problem  22 or if this is just an anomaly."  23 Q. Okay. And then you distinguished earlier  24 between a big and a small K9 unit. What's the  25 difference?</p>

<p style="text-align: right;">Page 142</p> <p>1 A. There are many departments which don't have a 2 unit. They have a guy with a dog or a couple of guys 3 or gals with dogs and they just fall under the normal 4 supervision of whatever shift they are working. 5 Q. Okay. 6 A. And that is really the largest number of 7 programs in the United States. 8 Q. If you're -- Bexar County Sheriff's Office, I 9 believe, has a K9 unit. Is that your understanding, 10 too? 11 A. Yes. 12 Q. So they would be a bigger unit relative to 13 these other ones that don't have a defined unit? 14 A. Correct. 15 Q. Okay. I wanted to ask you about your course 16 on detection training at Leeburg -- 17 A. Yes. 18 Q. -- that we talked about earlier. And the 19 title of that, tell me if I'm getting this right, K9 20 Detector Dog Training, does that sound right to you? 21 A. I think that's what the title ended up 22 becoming. 23 Q. Okay. 24 A. It's -- I work with people that -- the tech 25 people with Leeburg and, you know, sometimes things</p>	<p style="text-align: right;">Page 144</p> <p>1 individual modules and compare them with individual 2 pages. Take as much time as you need. 3 But the basic question is do you agree 4 this is an authentic and correct copy of your course? 5 A. This appears to be, yes. 6 Q. Okay, thank you. That will speed things up. 7 And so I guess my first question is when 8 did you create this course? 9 A. Oh, I think it went up about November of '23. 10 Q. Okay. And what was your role in creating it? 11 A. It's mine. 12 Q. So you're the sole author of the course? 13 A. There are some things in there that -- 14 advertising things for Leeburg and some promotions for 15 products and some things like that that are in there. 16 We just recently added a section that was on basically 17 poisonings and overdoses for dogs that we just added 18 to. It's just kind of a dynamic thing. We add to it 19 all the time. 20 Q. Okay. Do you have a sense of who takes your 21 courses? In other words, do you interact with 22 students? 23 A. There is a question and answer, but they -- I 24 have no real background on what -- on what their -- 25 where they -- what they are doing. So I do answer</p>
<p style="text-align: right;">Page 143</p> <p>1 get changed. 2 Q. Okay. Well, let's -- I'm going to show it to 3 you. So I think this is going to be Exhibit 106, is 4 that right, we have only done one? So just give us a 5 moment here. 6 I apologize for the size of this 7 document. This is what your course looks like printed 8 out. 9 A. Oh, boy. I have never printed it out. At 10 least we're not going to go through all 300 videos, I 11 hope. 12 Q. I thought you would get a kick out of that. 13 No, no. 14 (Exhibit 106 marked) 15 Q. All right. We're handing you what's being 16 marked as Exhibit 106. 17 A. Okay. 18 Q. All right. So take a minute to look through 19 that. 20 A. A minute? 21 Q. Or as much time as you would like. What I 22 would like to ask you is whether this pile of paper 23 that I've handed you looks like an accurate printout of 24 your course from the Leeburg website. And before you 25 answer, I'm happy to pull up the website and look at</p>	<p style="text-align: right;">Page 145</p> <p>1 questions on the -- through the platform. 2 Q. Okay. 3 A. And I don't get that many questions. I get a 4 few. 5 Q. Okay. 6 A. Usually it's the same person asking all of 7 them, like any other class. 8 Q. Okay. 9 A. So... 10 Q. Is it fair to say that this course basically 11 is just consumed by people online? 12 A. Exactly. 13 Q. Okay. And it's -- this is a reflection and 14 kind of a distillation of -- you know, you have a long 15 career in this area, of the principles you think are 16 kind of essential to effective detector dog training? 17 A. Yes. 18 Q. Do you have any sense of whether a Bexar 19 County Sheriff's officer has ever taken this course? 20 A. I have no idea. 21 Q. No clue? 22 Prior to testifying in this case, have 23 you ever had any interaction with the Bexar County 24 Sheriff's Office? 25 A. No.</p>



<p style="text-align: right;">Page 146</p> <p>1 Q. Okay. Let me ask a question about a few of 2 the parts of this packet. All right. So flip to -- 3 let's do this by module, if that makes sense. 4 A. Okay. 5 Q. So we're going to go to Module 7, Segment 4. 6 I'll try to find the page. Yeah, it's going to take me 7 a minute, too. 8 A. Okay, I'm at Module 2. 9 Q. Page -- let's see. Drats, there's no pages. 10 Well, it's going to take us a minute. And what I can 11 do, honestly, this might be easier, let me pull up the 12 course on the screen up there -- 13 A. Okay. 14 Q. -- and we can go through on the website. 15 A. That will be much easier. 16 Q. As long as you're -- yeah, as long as you're 17 comfortable this printout is an accurate 18 representation, then we can just navigate on the -- 19 A. Yeah, it's much easier to navigate through the 20 website than this. 21 Q. Yeah, so let's do that. How does that look? 22 A. Good. 23 Q. Okay. So Module 7, Segment 4. 24 Q. Okay. So I just wanted to ask you about -- 25 A. You found the word "gamble."</p>	<p style="text-align: right;">Page 148</p> <p>1 stares, that's the dog's indication, right? 2 A. Yes. 3 Q. And the idea is he has got to fail there 4 because he is not doing the work needed to know if 5 there is actually narcotics? 6 A. Yes. And so with these boxes, I'm actually 7 inducing these behaviors so that I can fix them -- 8 Q. Got it. 9 A. -- before they ever actually develop. 10 Q. Okay. What if the dog isn't allowed to fail, 11 what happens? 12 A. There are other approaches. Some people use 13 some compulsion, some people represent -- they mark a 14 bad behavior, "No." That that isn't my approach. That 15 doesn't mean other approaches aren't appropriate. 16 Q. Okay. My question is more what if the dog 17 isn't given some negative punishment for the stare? 18 A. Well, sometimes they might receive positive 19 punishment. 20 Q. Like what? 21 A. Correction or -- or a mark that they are -- 22 there is an impending correction. 23 Q. Okay. So, either way, there has to be some 24 kind of punishment, whether positive or negative, for a 25 gambling behavior?</p>
<p style="text-align: right;">Page 147</p> <p>1 Q. I did find the word "gamble." And, you know, 2 if you want to watch the video, I'm happy to show it to 3 you. 4 A. I know what's in this video. 5 Q. Yeah, and so do I. So what I'm going to do is 6 just ask you about the text here, unless anybody else 7 in the room needs to see the video. So I'll just read 8 it to you. "In the following videos, you will see a 9 dog gamble. He tries to get a reinforcement for just 10 doing the indication. In this case, it is a stare and 11 he must fail. Failure, when orchestrated properly, is 12 a great learning tool. It is, by definition, negative 13 punishment?" 14 Did I get that right? 15 A. Correct. 16 Q. So I just wanted to ask you about the staring 17 part of this. You say that in this video, the dog 18 stares and that's -- that's indicative of a gambling 19 behavior. 20 Can you unpack that for me? 21 A. No, no, staring is not indicative of a 22 gambling behavior. 23 Q. Okay. 24 A. This is this dog's particular indication. 25 Q. Oh, I see. So the point is when the dog</p>	<p style="text-align: right;">Page 149</p> <p>1 A. Yeah. There's only limited ways animals can 2 learn, us included. 3 Q. Okay. If -- if there isn't that kind of 4 punishment for a gambling behavior, what would you 5 expect to happen? 6 A. Sort of expect they will take care of it. I 7 mean, there is not any real solution here. You're not 8 going to reinforce it, you're not going to get a reward 9 for it. So that falls under negative punishment. 10 Q. Okay. And you said you're not going to give a 11 reward for it. Why would you not do it? 12 A. He's wrong. 13 Q. Okay. And so if you give a reward, you're 14 encouraging the dog to continue gambling in the future? 15 A. We're not training detection. We're training 16 a stare at that point. 17 Q. Okay. So you would be training the dog to 18 perform the indication behavior if you had rewarded him 19 for -- 20 A. It wouldn't be an indication because it's not 21 associated with odor. We would be teaching him to 22 stare. 23 Q. I see what you're saying. So just to be 24 clear, in a case where the dog is -- in this case, 25 where the dog is staring as his indication behavior,</p>



<p style="text-align: right;">Page 150</p> <p>1 rewarding him for the stare would train him to continue 2 staring to get more rewards? 3 A. Yes. 4 Q. Okay, thank you. And Module 11, Segment 1, 5 let's turn to that. Okay. So do you see that we're on 6 Module 11, Segment 1? 7 A. Yes. 8 Q. And I wanted to ask you about a few things on 9 this page, but just kind of the first question I have 10 for you is you call this page cardinal handling rules. 11 What do you mean by cardinal rules? 12 A. So at this stage of training, these are -- 13 this is the behaviors that I need the handlers to 14 follow. That's what that says. 15 Q. So cardinal rules means these are sort of 16 essential rules? 17 A. Correct. 18 Q. The -- let's see here. So I'm just going to 19 go through this a little bit. "The dog is never pulled 20 away from odor except in stupidproofing." 21 Did I read that right? 22 A. Yes. 23 Q. What does that mean? 24 A. The reality of handling is that it's never 25 perfect. So when I'm training handlers and dogs, I</p>	<p style="text-align: right;">Page 152</p> <p>1 another word for it that I think is way cooler and that 2 is that teaching the dog to be disobedient -- 3 disobedient in the presence of odor. 4 Q. Okay. So I understand why you wouldn't pull a 5 dog away from odor, so then explain what stupidproofing 6 is. 7 A. Disobedience in the presence of odor. 8 Q. Okay. So -- 9 THE REPORTER: Presence of odor, right? 10 THE WITNESS: Yes. 11 THE REPORTER: Okay. 12 Q. (BY MR. WINDHAM) So I may need to go a little 13 bit slower. You're saying that stupidproofing is 14 disobedience in the presence of odor? 15 A. Correct. 16 Q. So what is the handler's role in 17 stupidproofing? 18 A. We will create situations where we do the 19 wrong thing so the dog overrides it. 20 Q. I see. Okay. And so you're just testing to 21 see if the dog can get it right when the handler gets 22 it wrong? 23 A. Exactly. 24 Q. Okay, that's helpful. 25 What about this next part, I'll just kind</p>
<p style="text-align: right;">Page 151</p> <p>1 teach them to overcome those -- those things, and 2 that's what I call stupidproofing. 3 Q. Okay. 4 A. A simple example would be I'm going down a row 5 of lockers and my dog begins to alert, but I'm looking 6 towards the next place so I don't trip and it hits -- 7 you know, the dog hits the end of the leash, I don't 8 want him to think he was just corrected for that. I 9 want him to go, "Nope, I'm right," and go right back 10 into it. 11 Q. So I'm not sure I get how that kind of 12 attaches or connects to pulling away from odor and 13 stupidproofing. Maybe that's just because I'm being 14 stupid, but -- 15 A. So we don't ever want to take a dog who is -- 16 who has alerted or has a behavior change. We don't 17 want to pull them away from that. 18 Q. Okay. 19 A. We want to let them explore that and let them 20 work towards a conclusion. They may decide there's 21 nothing here and move on on their own. We don't want 22 to influence that one way or the other. 23 Q. Okay. 24 A. Sometimes we do because we're human. And so 25 by stupidproofing, which is my little word, I have</p>	<p style="text-align: right;">Page 153</p> <p>1 of go through it slowly. "If the dog alerts and 2 indicates, but the handler stays in the scent cone and 3 takes away the reinforcer, the dog may go back to the 4 find without being told 'Move on.' This concept is odd 5 to a dog. What it means is he needs you to give 6 permission to approve the find. This is a slippery 7 slope." 8 Kind of unpack that for me. 9 A. Okay. This is in reference to the stage of 10 training we're in and as we move through training, a 11 mistake that many handlers end up doing is that they -- 12 they remain where the find is at and there is odor 13 emanating from that find. And they play with their 14 dog, tell him how great he is, give him a reinforcer, 15 whatever, and then they take the reinforcer away, but 16 now the dog is in that odor. What should the dog do 17 when he is in the odor of an assigned substance? Seek 18 it out. Seek it out. 19 But then the handler has to tell the dog 20 no because they want to move on, so I make the dog -- 21 make the handler move away from where the odor is most 22 likely so that the dog does not have to be told, "No, 23 don't go there." I don't want to tell my dog ever 24 "Don't go to the odor." 25 Q. Okay.</p>

<p style="text-align: right;">Page 154</p> <p>1 A. Odor is -- that's something they have to --  2 they have to be dedicated to and it's something that I  3 can't determine is right or wrong and it can't be right  4 now and wrong in a moment.  5 Q. Okay.  6 A. And so that's what that's about. That's about  7 handling -- handling concepts.  8 Q. And then what's the slippery slope you're  9 talking about there?  10 A. Because I don't want to tell my dog no, and  11 that's essentially what you're doing, even if you don't  12 use the words, if you take a dog out of odor and make  13 him leave it. So the only way to get him out of the  14 odor is to continue to play ball or tug or whatever  15 your reinforcer is away from it.  16 Q. So the idea is you don't want the dog -- tell  17 me if I'm getting this wrong. You don't want the dog  18 to be basically following the handler and kind of  19 dependent on the handler to know what to do?  20 A. No, I want the dog to tell us where odor is at  21 no matter what.  22 Q. Right. On its own?  23 A. On its own --  24 Q. Yeah.  25 A. -- without the support of the handler.</p>	<p style="text-align: right;">Page 156</p> <p>1 Q. Can I see if I'm understanding ritual?  2 Because I think I'm still a little fuzzy on it, and so  3 let me ask it this way.  4 A. Let's go to rituals. Go to five, rituals in  5 detection work.  6 Q. Sure, yeah. Which one do you want, just the  7 module page?  8 A. Go to -- I'm not sure if it's in two or three,  9 but try two.  10 Q. Okay.  11 A. Okay. Is that a picture or is that a video?  12 Q. It's a picture.  13 A. Keep scrolling down. Okay, right there.  14 Q. Do you want me to try playing it?  15 A. Yes.  16 Q. Okay. 18 seconds.  17 (Video played)  18 Q. Okay. So, for the record, we just watched the  19 18-second video that you can find on Segment 2 of  20 Module 5; is that right?  21 A. Correct.  22 Q. Okay.  23 A. And so for this, what's happened on that video  24 is this particular dog was getting up too early. And  25 so the ritual that I teach -- other people teach</p>
<p style="text-align: right;">Page 155</p> <p>1 Q. That's what I'm getting at.  2 A. And I don't want him to need permission.  3 Q. Okay. And then this next sentence, "The dog  4 is unable to understand that it is desirable to find  5 and search out odor, but other times it is not."  6 A. Yeah, it shouldn't be conditional. You can  7 smell odor, you're going to sniff, you smell odor, do  8 your thing. It shouldn't be, "Well, I just found this.  9 It's what we're looking for it. Why should I leave?"  10 That's confusing to a dog.  11 Q. And then on this next one, "Do not skip your  12 ritual. Be consistent in your handling. Don't skip  13 it."  14 A. And this is a little bit of me. This isn't  15 like an industry standard rule. I believe very  16 strongly that rituals help, particularly multipurpose  17 dogs, to really understand what our -- the context of  18 the skill we're doing. The uninitiated thing that I  19 tell the dog to do something and it understands  20 instantly what we're supposed to do. That's kind of  21 the TV version of it.  22 But the reality is they are much better  23 at looking at the context, the whole context and a  24 ritual for a human being provides good context to  25 disseminate to the dog.</p>	<p style="text-align: right;">Page 157</p> <p>1 different rituals; it doesn't mean mine is better than  2 anybody else's, although I think it is.  3 But the dog is placed in a down position,  4 the handler inspects the area that the dog is intended  5 to search, returns to the dog, picks up the leash and  6 then gives permission to the dog to get up and initiate  7 a sniff. That's the ritual that I teach.  8 Q. Okay.  9 A. Whether people know they are teaching a ritual  10 or not, sometimes I even question if they know it, but  11 they all are because they do it all the same.  12 Q. Okay.  13 A. For some people, the ritual might actually be  14 I get my dog on a leash, I bounce the ball a couple of  15 times and we go. And it's interesting to watch a dog  16 who that's their ritual because you'll see the dog  17 start looking for the start place while you're bouncing  18 a ball instead of looking at the ball because they know  19 they must perform a task before they can receive that  20 ball.  21 Q. Okay. So the concept of a ritual is a way of  22 contact setting --  23 A. Correct.  24 Q. -- for the dog?  25 A. Correct.</p>

<p style="text-align: right;">Page 158</p> <p>1 Q. Okay. And so if a ritual is performed, the 2 dog -- if it's a narcotics dog, for example, the dog 3 knows, "All right, we're doing narcotics detection," 4 right? 5 A. Yes. 6 Q. As opposed to obedience or something else? 7 A. Tracking. 8 Q. Okay, sure. But obedience could be one, too, 9 right? 10 A. Correct. 11 Q. And the reason I ask about that is, as I 12 mentioned, I have a Golden Retriever and I'm thinking 13 about the hand signal for sit where your palm is up and 14 your fingers go up and how if my dog were a narcotics 15 dog, I wouldn't know how to tell him that -- if I want 16 to use my hand in the deployment, how do I know it's 17 not a command to sit. 18 Do you see what I'm asking? 19 A. Yeah. 20 Q. Okay, good. 21 A. The easiest way for me to explain that is that 22 you artificially created "sit." This doesn't mean 23 anything to the dog. 24 Q. And you're lifting your hand up with your palm 25 up, for the record?</p>	<p style="text-align: right;">Page 160</p> <p>1 A. Everything is contextual. 2 Q. Okay. 3 A. Within the context of a sniff, the dog is 4 doing a different behavior than obedience regardless. 5 Q. Right. 6 A. And also, the dog is flushing. It's not 7 simply an obedience behavior. And so if you go through 8 this -- all of these things, you're going to find that 9 I may have a dog, when I tell him to sit, he sits in a 10 particular manner. And it's a defined sit, "Put your 11 butt on the ground and hold it there until I tell you 12 to move." That's obedience. 13 When you look at the flushing behavior 14 that these dogs in detection have, many of them are 15 hovering off the ground, they are half into a crouch. 16 These are the -- these -- this is an indication versus 17 obedience. 18 Q. And what I -- what I'm getting at is just the 19 role of the ritual in this. So what I'm getting, and 20 just tell me if I'm off on this, is that when you do a 21 ritual, you're giving the dog the context to know, 22 "We're in detection mode right now, so sitting 23 means drugs, sitting doesn't mean obedience." 24 Do you get what I'm asking? 25 A. They don't -- the dog is not going to view it</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Yes, copying you. And -- but that means 2 nothing to a dog, right, nothing, until you pair it 3 with a reinforcement and then it becomes something. 4 That's what's happening here is we're pairing this down 5 in the inspection with a sniff so it just gets -- we 6 get layer after layer -- it's not immediate -- layer 7 after layer. If I go through this down and I start to 8 anticipate -- I'm talking like I'm the dog -- I start 9 to we're going to do a sniff, and if I do a sniff and 10 if I'm successful, I get a reinforcer. And so they go 11 through that process. Show if -- 12 Q. Let me ask you -- 13 A. It's going to take us -- it took me a long 14 time to build this course. We're going to be here 15 forever. 16 Q. Well, let me ask a question -- I think this is 17 going to help. So suppose I'm deploying a dog and I'm 18 a handler and the dog has been trained in obedience to 19 sit with an upward hand motion, palm up. 20 Follow me so far? 21 A. Yes. 22 Q. Okay. And the dog also happens to have an 23 indication behavior where they sit, right, so "sit" 24 then could mean two different things. 25 Does that make sense so far?</p>	<p style="text-align: right;">Page 161</p> <p>1 like this is -- the dog has totally different 2 behaviors. It may -- it may have been encouraged to 3 sit, you may have put your hand on the dog's rear 4 end -- 5 Q. Right. 6 A. -- and had him sit and then they -- you 7 reinforce that over and over again, but the -- but the 8 emotion for the dog is entirely different. 9 Q. Sure. 10 A. In obedience, it's servitude. 11 Q. And I'm just asking about the connection of 12 the ritual to this whole -- 13 A. Yeah, and that's -- the ritual, whether you -- 14 whether you do it the way I do it or somebody else does 15 it, separates those things. 16 Q. Great. 17 A. It makes them -- it gives them different 18 context. 19 Q. Okay. If a ritual -- if a dog is used to 20 having a ritual and it is not performed, is it possible 21 they are not going to be sure which the context is? 22 A. What I will tell you is everybody has a ritual 23 whether they know it or not. 24 Q. Okay. 25 A. Because people are taught to be repetitive</p>

<p style="text-align: right;">Page 162</p> <p>1 about the way they deploy their dog. And, I mean, some  2 people, even to the degree where they will only start  3 at one corner of the car, you know, I'm not that rigid  4 of an individual, although I think it's important, but  5 some people do, and so that becomes part of the ritual.  6 Q. Gotcha. I wanted to go back to the cardinal  7 rules because we didn't quite finish that. And thanks  8 for clarifying that.  9 A. Yeah.  10 Q. Okay. So we're back on Module 11, Segment 1,  11 and there is one more paragraph here. So the last part  12 is "Only reinforce an alert/indication when it is  13 known. Do not reinforce on the street unless it is  14 100 percent known."  15 I'll stop there. What does that mean?  16 A. This is the way I approach it. It is not an  17 industry standard. This is the way I approach it.  18 This is -- for me, when I take new people who have  19 never done this work before and I'm still questioning  20 whether or not they -- they have a 100 percent real  21 understanding of their dog's behavior, I don't want  22 them to make any kind of mistakes.  23 And so this is just the foundation, and I  24 think you can go back, this is at this stage, and they  25 haven't learned anything about variable reward systems</p>	<p style="text-align: right;">Page 164</p> <p>1 by reinforcing in the street a few times.  2 Q. Okay. So my question is more about how to  3 read this -- this cardinal rule that you're giving  4 here.  5 A. In the context of where we're at in training.  6 Q. Sure, sure. So there's a reference here to  7 "Do not reinforce on the street unless it's 100 percent  8 known."  9 So what does "100 percent known" mean?  10 A. I'm talking in -- a little bit, I'm talking in  11 superlatives here.  12 Q. Okay.  13 A. I want to make a point. And I have been on  14 the street and run my dog and I can see a bail of  15 marijuana in the backseat, I can see it.  16 Q. Okay.  17 A. I'm reinforcing it right now.  18 Q. Give him the toy?  19 A. Yeah. I literally opened the car door on a  20 vehicle once and a duffle bag full of kilos fell on my  21 feet.  22 Q. Okay.  23 A. So there are times when you know it, so I  24 reinforce those times.  25 Q. Yeah.</p>
<p style="text-align: right;">Page 163</p> <p>1 or anything like that at this point. And so this is --  2 this is where I want you today.  3 When we get out on the road, we talk  4 about doing some things a little bit different.  5 Initially, staying the same as I taught you, but later  6 on, bring the dog back if you find something. That's  7 one -- one solution. A second solution is that if you  8 know your dog is spot-on, you can reinforce. That is  9 not always my way, but my way is not the only way.  10 The other way is to do it occasionally,  11 but not every time. Intermittent -- intermittent  12 reinforcement for that.  13 Q. Why would it not be every time?  14 A. Well, because then the dog doesn't start to  15 anticipate. That's the theory. Again, I'm giving you  16 some industry -- industry approaches. I'm not telling  17 you that this is -- that any one way is the only way  18 because, like I said, you get ten people in this room,  19 you're going to get all these different ideas.  20 Q. Well, let's narrow this down. I'm just asking  21 about your view of the best way.  22 A. If the dog -- if the dog was properly  23 selection tested and properly trained in the manner  24 that I train, I have not had very many problems with  25 this and if I have had problems, it was resolved simply</p>	<p style="text-align: right;">Page 165</p> <p>1 A. And another time that I remember reinforcing  2 was we were searching a house and this particular  3 individual apparently liked to have all of his stuff on  4 display, so he had a jewelry case with a glass front,  5 it was very ornate, very nice and it was full of all  6 his stuff. And my dog alerted and indicated on it and  7 I reinforced it.  8 Q. So these are examples of where you were  9 100 percent sure there was an illegal narcotic there,  10 right?  11 A. It was close to 100 percent.  12 Q. Sure.  13 A. Like I said, I'm talking superlatives.  14 Q. Yeah. So what are -- it sounds like -- let me  15 ask you this way.  16 Are there situations where, out on the  17 street in real deployments, aside from this 100 percent  18 sure that there are narcotics there situation, are  19 there other situations where it's proper to reinforce  20 the alert/indication?  21 A. If the dog's performance seems to be -- he's  22 not searching with -- sniffing with the intensity, I  23 would have to coach that you're going to have to do  24 some reinforcements on the street.  25 So we don't want extinguishing the</p>

<p style="text-align: right;">Page 166</p> <p>1 behavior to come in and it's possible that if you're in  2 a busy schedule, you're doing enough sniffs on the  3 highway or on the roadside to where you've started to  4 extinguish the behaviors of the dog. We can't let that  5 happen or we have no tool.  6 Q. Okay. So -- so one is when the dog starts to  7 lose energy or motivation, that's one example of when  8 it might be appropriate to reward an alert/indication  9 before it is known on the street?  10 A. Correct.  11 Q. Are there any others you can think of?  12 A. Those are -- from my view, those are the times  13 I do it.  14 Q. So when you 100 percent know and then when the  15 dog is sort of losing energy?  16 A. Correct.  17 Q. No other times?  18 A. Correct.  19 Q. Okay.  20 A. And I'm going to point out, that's me. If you  21 put other people in this room, you're going to get a  22 different answer.  23 Q. Okay. Let's move to a different module. So  24 Module 4, Segment 1, I just want to ask you about a  25 couple of these lines. So do you see that we're on</p>	<p style="text-align: right;">Page 168</p> <p>1 tease the dog by hiding a toy in your pocket." I  2 don't -- I don't want the dog looking to the handler at  3 this stage of training. I want the handler's  4 involvement to be as little as it possibly can. This  5 is -- this is an application of the primary reward  6 system.  7 Q. So the point of not hiding toys or attempting  8 to tease the dog with the toys is what?  9 A. I want the focus, go out there and find --  10 find what we're hunting.  11 Q. Okay.  12 A. I don't want you to look to me for that. I  13 don't have anything to do with it. You're the hunter,  14 I'm the follower.  15 Q. Is that the same in deployment, you want the  16 dog's focus to be the same?  17 A. We will add directability in later. That's  18 not where we're at in this course.  19 Q. Okay. What about -- you mentioned teasing the  20 dog by hiding a toy in your pocket. Is that something  21 that's okay in training, but not okay in -- sorry, not  22 okay in training, but okay in deployment?  23 A. It's not okay in training at this stage of  24 training.  25 Q. Okay.</p>
<p style="text-align: right;">Page 167</p> <p>1 Module 4, Segment 1 of your course?  2 A. Yes.  3 Q. Okay. And if you need to see the video, just  4 let me know. It's a longer one. But my question is  5 about that text below the video, so I'll just read a  6 few of those lines. "Do not point out the  7 reinforcer/reward to the dog."  8 What does that mean?  9 A. Don't help.  10 Q. What do you mean?  11 A. Don't help.  12 Q. Well, can you give me a little bit more  13 information?  14 A. So at this point it's very important that you  15 understand the context of where we are at in the  16 training. This is not an end result. We are building  17 up dogs at the moment.  18 So at this point in time, I want the dog  19 to discover the primary reinforcer, the primary reward  20 by itself, manipulate its environment through a  21 flushing behavior and receive that before the handle  22 becomes involved. That's the stage of training we're  23 talking about here.  24 In addition, the next line below that  25 says, "Don't hide toys about your body or attempt to</p>	<p style="text-align: right;">Page 169</p> <p>1 A. We're moving through -- we have gone through  2 these modules and segments, we're moving through a  3 training course, not an end result until -- until this  4 is all completed.  5 Q. Right. And I guess what I want to know is  6 some of these training principles, I kind of want to  7 know how they map onto deployment, if you see what I'm  8 getting at.  9 A. Right here, we're not -- we're not even  10 thinking about deployment.  11 Q. Right. And what I want to know is this line  12 about not hiding toys on your body or attempting to  13 tease the dog with toys in your pocket, I understand  14 what you're saying about training. My question is how  15 does that apply in deployment?  16 A. It doesn't.  17 Q. It doesn't apply at all?  18 A. No. By the time we get there, it doesn't  19 apply.  20 Q. So it's -- would you say it's fine for a dog  21 to -- I don't know, visibly tease the dog with a toy  22 actively during a deployment?  23 A. That might be part of the ritual for that  24 handler.  25 Q. Okay.</p>

<p style="text-align: right;">Page 170</p> <p>1 A. Here's your toy, this is what you might earn.</p> <p>2 Q. Yeah.</p> <p>3 A. So for that handler, it might be. So, yeah,</p> <p>4 it could be the only way to get the dog understanding,</p> <p>5 "Oh, I've got to go do a sniff."</p> <p>6 Q. What about after the ritual, would it be</p> <p>7 appropriate to tease the dog with a toy?</p> <p>8 A. After the ritual? Well, the dog should be --</p> <p>9 if the dog is deployment ready, the dog should be -- it</p> <p>10 should be wanting to sniff.</p> <p>11 Q. So is that -- is that a yes or no?</p> <p>12 A. Well, it's sort of totally out of context from</p> <p>13 the way that I'm understanding the question.</p> <p>14 Q. So the question is we're talking about teasing</p> <p>15 dogs with toys during deployments. And I understood</p> <p>16 you to testify a second ago that it's okay if it's part</p> <p>17 of a ritual because it primes the dog, right?</p> <p>18 A. Yeah. And there may be a point where the dog</p> <p>19 gets diverted or distracted and you basically repeat</p> <p>20 your ritual.</p> <p>21 Q. Okay.</p> <p>22 A. And so for my guys, that would put the dog</p> <p>23 back in a down and we do an inspection again. And it</p> <p>24 could possibly be -- I might show them that there's a</p> <p>25 toy and they might think I'm hiding it out there</p>	<p style="text-align: right;">Page 172</p> <p>1 outside observer. It takes somebody like me to look at</p> <p>2 it.</p> <p>3 Q. Okay. So do you think it's clean, but maybe</p> <p>4 it's just not clean to the outside observer?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Have you ever, in your experience, seen</p> <p>7 a situation where a handler, during a deployment, was</p> <p>8 sort of displaying a toy and then prompted the dog to</p> <p>9 alert?</p> <p>10 A. No, no, usually what you see is then they just</p> <p>11 get diverted by the toy.</p> <p>12 Q. They just get distracted by the toy?</p> <p>13 A. They just want the toy.</p> <p>14 Q. Okay. Have you ever heard of that happening</p> <p>15 before?</p> <p>16 A. You know, I'm sure somewhere -- dogs display a</p> <p>17 lot of behaviors. I'm sure somewhere it's happened.</p> <p>18 Q. Yeah.</p> <p>19 A. But they are amazing creatures. They can</p> <p>20 adapt to a lot of situations. And so I'm sure</p> <p>21 somewhere it's happened. It hasn't been within my --</p> <p>22 the context of my work.</p> <p>23 Q. Okay. Let's see. Module 4, Segment 2, just a</p> <p>24 quick question about that. Let me try to find it. I</p> <p>25 must have it wrong. It's Module 10, Segment 5, sorry</p>
<p style="text-align: right;">Page 171</p> <p>1 somewhere, earlier in the training. But -- so if you</p> <p>2 have to repeat your ritual to get the dog back on task,</p> <p>3 that's okay.</p> <p>4 Q. Okay. What about when you're actively kind of</p> <p>5 walking around the car with the dog? So they're not</p> <p>6 distracted by something and the ritual is over, is it</p> <p>7 okay to tease the dog with a toy then?</p> <p>8 A. Tease the dog? I have seen handlers who carry</p> <p>9 the -- carry the toy right in front of the dog and</p> <p>10 that's not teasing them with it. They know they've got</p> <p>11 to go sniff before they are going to get it. So -- but</p> <p>12 I've seen people dangling toys off their belts and</p> <p>13 putting them in pockets. I have seen guys who hold</p> <p>14 it by the -- hold a tug by the handle right in front of</p> <p>15 their dog. If that's the context you train in and the</p> <p>16 dog understands it, then that's okay. It's not my way.</p> <p>17 Q. Sure.</p> <p>18 A. But that's not -- that doesn't mean that it's</p> <p>19 not a good way.</p> <p>20 Q. Is there a reason it's not your way?</p> <p>21 A. Because you're asking questions about it, to</p> <p>22 be honest with you. I like to avoid questions. I want</p> <p>23 it to be clean, very clean.</p> <p>24 Q. Okay.</p> <p>25 A. And I'm not sure that that's clean to the</p>	<p style="text-align: right;">Page 173</p> <p>1 about that.</p> <p>2 Okay. So do you see we're on Module 10,</p> <p>3 Segment 5?</p> <p>4 A. What is the name of this module?</p> <p>5 Q. Good Examples of Basic Searches.</p> <p>6 A. Okay.</p> <p>7 Q. Okay.</p> <p>8 A. This might be -- some of this may actually be</p> <p>9 new to me.</p> <p>10 Q. What do you mean?</p> <p>11 A. Well, the owner, a friend of mine, he does a</p> <p>12 lot of the videos and he wanted to put a bunch of</p> <p>13 videos for people to see it and some of them I was able</p> <p>14 to go back and make commentary on and some I couldn't.</p> <p>15 Some he may have even made.</p> <p>16 Q. We're going to pause just for one second while</p> <p>17 we get the WiFi settled.</p> <p>18 (Discussion off the record)</p> <p>19 MR. WINDHAM: We're going to go back on</p> <p>20 the record and keep moving here. Are we good?</p> <p>21 THE REPORTER: Yes.</p> <p>22 Q. (BY MR. WINDHAM) All right, sir, we're back</p> <p>23 on the record. Do you recognize you're still under</p> <p>24 oath?</p> <p>25 A. Yes.</p>



<p style="text-align: right;">Page 174</p> <p>1 Q. So I just wanted to ask you about this text  2 here. Also, we're happy to -- I'm happy to watch the  3 video, but the text at least says, "Nice search of a  4 break room, no marker and you can see the dog look back  5 after the initiation of the indication. This is  6 important. The indication comes before the dog checks  7 in. If the dog were to check in before the indication,  8 ask for confirmation/permission, it would be faulty."  9 So just help me understand what that  10 means.  11 A. Play the video.  12 Q. Sure.  13 (Video played)  14 THE WITNESS: That's a horrible video.  15 It gives me a headache. Okay. What you saw was kind  16 of a hectic dog who was a little bit all over the  17 place -- in fact, his name is Hans.  18 THE REPORTER: He what?  19 THE WITNESS: Hans, the dog's name is  20 Hans. And so he settles into the sniffing finally and  21 locates an odor. He does it, he focuses on it,  22 initiates an indication and then looks over his  23 shoulder. That's okay. Nothing wrong with that.  24 What I -- what can become a slippery  25 slope, and I coach people not to do this, is that you</p>	<p style="text-align: right;">Page 176</p> <p>1 shoulder at the handler prior to doing the indication?  2 A. No, and the handler then behaved differently  3 than the rest of the sniff.  4 Q. Okay.  5 A. So the handler -- if the handler then provided  6 information, and this is one of the reasons why we  7 do -- we do single blind for the vast majority of our  8 training is because then the handler can't know, so he  9 can't say, "Yeah, you're right."  10 If you're doing all kinds of known finds,  11 it's going to be very difficult for you, as a handler,  12 to not give information that the dog can read because  13 dogs are good at it.  14 Q. So the --  15 A. That's why earlier in this I said we do most  16 of our training single blind.  17 Q. So the information that a handler might give  18 is a "good boy," for example, right?  19 A. It can be more subtle than that.  20 Q. Well, I'm just asking -- that's the example  21 you just gave, right?  22 A. Yes, that was an example I had given.  23 Q. Okay.  24 A. But that -- and that's a dramatic one.  25 Q. I mean, just to kind of spell this out, so</p>
<p style="text-align: right;">Page 175</p> <p>1 don't want to provide information for a dog who gets  2 into some odor and then turns around and goes, "Help me  3 out, dude."  4 Q. And you're looking over your shoulder?  5 A. Yeah, I'm the dog looking over my shoulder,  6 "Come help me out." We want the dog to do it  7 independently and the easy way to make that  8 determination is that he does the alert followed by the  9 indication without looking over his shoulder at you.  10 Q. Okay. So in this video, the sequence that we  11 saw, I think, was that the dog sat and then looked over  12 his shoulder at the handler and you're saying that's  13 the right order?  14 A. The important part of the thing is that he  15 alerted, did the find, searched it out, focused on --  16 on an area that he felt was -- was correct, initiated  17 an indication before he looked over his shoulder.  18 And some styles of training and with some  19 dogs who like to interfere with things, like bomb dogs,  20 I'll actually encourage them to turn around and look.  21 It keeps them out of trouble. More on the bomb dog  22 side than the dope dog side.  23 Q. In the narcotics detection side, you said it  24 would be a slippery slope if -- just to make sure I  25 have the order right, if the dog looked over his</p>	<p style="text-align: right;">Page 177</p> <p>1 the -- I want to make sure I understand the order.  2 So the -- what you don't want is for the  3 dog to look over his shoulder and then receive that  4 "good boy" before they indicate?  5 A. Yeah, we don't want the human to give the dog  6 confirmation of what they think. We want the dog to  7 give us confirmation of what they think.  8 Q. Okay. And what are some things a human could  9 do, whether consciously or not, to give the dog  10 confirmation of what they think?  11 A. Change their breathing, get excited, say "good  12 boy." If that is only done in the context of  13 looking -- seeking confirmation, then that could become  14 a Clever Hans effect. So that's why single-blind  15 training is really very much an industry standard.  16 Q. You said earlier -- this was way earlier, you  17 mentioned something about like tapping on the wheel  18 well. Would that be an example of --  19 A. Yeah, and that's pretty extreme. Although,  20 you can -- it doesn't mean you can't tap things. It  21 just can't be to tell the dog it's there.  22 Q. Okay. I would like to show you another  23 exhibit and this is going to be the -- well, I'll just  24 show it to you first.  25 MR. WINDHAM: So we're introducing what's</p>

<p style="text-align: right;">Page 178</p> <p>1 been previously marked as Exhibit 32. This is going to 2 be tab D, Josh.</p> <p>3 We're just going to hand a placeholder 4 exhibit to you for this because it's video.</p> <p>5 THE REPORTER: Okay.</p> <p>6 Q. (BY MR. WINDHAM) While he gets that, I'll 7 just ask you, have you seen this video before? I'm 8 happy to play it, but do you recognize this video?</p> <p>9 A. I played it this morning.</p> <p>10 Q. You played it this morning?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. This is Deputy Molina's body cam from 13 the incident, right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. All right. So what I would like to do 16 is just kind of watch some of this with you and ask you 17 about it.</p> <p>18 (Discussion off the record)</p> <p>19 Q. So before I play the video, you mentioned you 20 watched it this morning. Did you watch the entire 21 thing?</p> <p>22 A. This morning I did not. I only watched the -- 23 the dog -- from the beginning through the completion of 24 the dog deployment --</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 180</p> <p>1 A. I think it started with parking his car in 2 front of the suspect's vehicle.</p> <p>3 Q. Okay. So you --</p> <p>4 A. That's an unusual thing for a person to do. 5 The only reason he's going to do it is so he can do a 6 dog sniff. The dog is already starting to understand 7 what I'm doing out here --</p> <p>8 Q. Okay.</p> <p>9 A. -- just by that behavior alone. Again, 10 rituals can be informal or they can be formal. I do a 11 very formal one when I'm training, but this -- in this 12 instance, he does an informal one. I'm sure the dog 13 knows that he put his ball in his pocket or, you know, 14 on his belt somewhere. All of that is telling the dog 15 what the next thing is going to be.</p> <p>16 Q. Okay. Did you watch any other Deputy Molina 17 deployment video?</p> <p>18 A. This is the only one I received.</p> <p>19 Q. Okay. So you don't have any way of comparing 20 the way he conducted this to the way he conducted any 21 other deployment?</p> <p>22 A. No.</p> <p>23 Q. Okay. And a ritual would be a pattern, right, 24 it would be something you would do every time?</p> <p>25 A. Yeah, if you did it most of the time.</p>
<p style="text-align: right;">Page 179</p> <p>1 A. -- this morning, but I have watched the whole 2 thing probably more times than I care to recount.</p> <p>3 Q. Okay. Probably me as well.</p> <p>4 So what we're going to do here is I'm 5 going to try to play segments of it, summarize for the 6 record what we watched. Please correct me if I get 7 something wrong that's important to you, but I just 8 want it to be clear on the record what portion of the 9 video we watched and then I'll ask a question or two 10 about that portion.</p> <p>11 A. Okay.</p> <p>12 Q. So we're going to start with 00:00 through 13 1:46. There is no sound at the beginning.</p> <p>14 (Video played)</p> <p>15 Q. Okay. So I paused it at 1:46 and let me see 16 if I can summarize that. So we just watched 00:00 17 through 1:46. Deputy Molina asks Mr. Schott for 18 consent to deploy K9 Max to sniff his car. After that 19 conversation, Deputy Molina goes to his patrol car, 20 puts Max's leash on, pulls Max out of the car and then 21 gets ready to start the sniff.</p> <p>22 Is that all about right?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And the thing I'm mostly wondering 25 about is rituals. So did you observe a ritual?</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. Okay.</p> <p>2 A. I mean, dogs -- dogs are really good at -- at 3 receiving information, way better than we think they 4 are. You know, somebody will tell me, "My dog is not 5 listening." Oh, he's listening, he's just not doing, 6 right. And so they are getting it. And so in this 7 case, I would call this an informal ritual.</p> <p>8 Q. Okay.</p> <p>9 A. But the dog is getting it. By the dog's 10 behavior that we see on the screen right now, which is 11 him going up along a seam, he absolutely knows what the 12 task is.</p> <p>13 Q. Okay. Let's watch the next clip here. So 14 this is going to be 1:46 through 2:42.</p> <p>15 (Video played)</p> <p>16 Q. So we just watched 1:46 through 2:42. I'll 17 try to summarize this once again. You can just tell me 18 if I missed anything important. So let's see. So 19 Deputy Molina is deploying Max on Mr. Schott's car. At 20 a couple points during this segment, Max tries to 21 wander away from the car and Deputy Molina pulls him 22 back. Also at a couple of points during this, Deputy 23 Molina makes a hand movement, it looks like an upward 24 hand movement. And then towards the end of the 25 segment, Max sits and he's looking at Molina at that</p>

<p style="text-align: right;">Page 182</p> <p>1 time and eventually barks and jumps, at which point</p> <p>2 Molina says on the radio, "There's been a positive</p> <p>3 alert on the driver's side door."</p> <p>4 Is that all right?</p> <p>5 A. I wouldn't characterize it as the dog trying</p> <p>6 to leave. The dog was working. He just needed to get</p> <p>7 him back on the focus of the sniff.</p> <p>8 Q. That's totally understood. Other than that,</p> <p>9 though, did I kind of get the gist of that --</p> <p>10 A. Yes.</p> <p>11 Q. -- right for the record?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then speaking of Max working the</p> <p>14 scene, so you don't think Max there is -- what do you</p> <p>15 think he's doing?</p> <p>16 A. There's -- so we're not in a static</p> <p>17 environment. There's cars going by, blowing stuff</p> <p>18 everywhere. There's -- you can't see, but there's</p> <p>19 larger vehicles, and so stuff gets pushed around and</p> <p>20 it's not unusual for a dog to just chase it. Remember,</p> <p>21 they don't -- a car is just a thing to them. Odor is</p> <p>22 more important, and so they will chase odor at times.</p> <p>23 And he has to -- as a handler, he has to realize, well,</p> <p>24 we're going nowhere with that, get back over here on</p> <p>25 the focus of my sniff. That's where we organize the</p>	<p style="text-align: right;">Page 184</p> <p>1 depend on what we're trying to accomplish with that.</p> <p>2 He's just trying to restrain the dog so he's not</p> <p>3 running down in the ditch.</p> <p>4 Q. Okay.</p> <p>5 A. And chasing odor.</p> <p>6 Q. Gotcha.</p> <p>7 A. And, you know, because that's not the focus of</p> <p>8 the sniff. In dog training, when we talk about</p> <p>9 pressure on the leash, we start talking about</p> <p>10 compulsion, correction, positive punishment or negative</p> <p>11 reinforcement. This was just restraint.</p> <p>12 Q. I guess what I'm kind of wondering is what the</p> <p>13 line is between allowing Max to kind of work the scene</p> <p>14 as he wants to and then Deputy Molina kind of directing</p> <p>15 Max's attention.</p> <p>16 A. They're on the side of a highway. He needs to</p> <p>17 keep control of that dog. It's a little hard to</p> <p>18 explain to your sheriff that the dog just became road</p> <p>19 pizza.</p> <p>20 Q. Well, I understand that. But at least in this</p> <p>21 video, right, Max is on the -- on the side of the car</p> <p>22 in the grass, not near the cars, right?</p> <p>23 A. Yeah.</p> <p>24 Q. So there's not a safety risk, at least right</p> <p>25 there, from Max wandering further in that direction, is</p>
<p style="text-align: right;">Page 183</p> <p>1 dog and when you saw the hand movement, that's a fairly</p> <p>2 normal thing to cast the dog back into the work.</p> <p>3 Q. Well, let me ask you first about Max being</p> <p>4 away from the car and then we will -- we will do the</p> <p>5 hand movement. So what would -- I guess I just want a</p> <p>6 reference point. What would it look like if a dog was</p> <p>7 getting distracted by something on the scene?</p> <p>8 A. It might not look altogether that different.</p> <p>9 This is why handler teams have to be working together.</p> <p>10 For this dog, it may not look a lot different, but the</p> <p>11 response would be the same, let's get back on task.</p> <p>12 Q. Okay. And earlier, I think when we were</p> <p>13 talking about getting distracted and the role of</p> <p>14 rituals, I thought you told me -- and just tell me if</p> <p>15 I'm getting this wrong -- that you would -- your best</p> <p>16 practice would be to kind of restart, do the ritual</p> <p>17 again and then --</p> <p>18 A. No, I think that's a misunderstanding.</p> <p>19 Q. Okay.</p> <p>20 A. If I can bring my dog back on task just by</p> <p>21 casting him back into what we're doing, that's an</p> <p>22 absolutely appropriate response.</p> <p>23 Q. Okay. And what degree of pressure on a leash</p> <p>24 would be appropriate?</p> <p>25 A. Pressure on the leash, I guess that would</p>	<p style="text-align: right;">Page 185</p> <p>1 there?</p> <p>2 A. Yeah, but you want to keep -- the dog doesn't</p> <p>3 know which is roadside and which isn't. You want to</p> <p>4 always maintain some degree of control of the dog.</p> <p>5 It's the way you do the work, and the reason you do the</p> <p>6 work that way is next time you might be on the opposite</p> <p>7 side of the road. You know, you just want to make sure</p> <p>8 you're keeping the dog on task and that if he gets</p> <p>9 diverted or distracted, get him back into the work.</p> <p>10 Q. I guess how does Deputy Molina know that Max</p> <p>11 is getting distracted in that moment?</p> <p>12 A. Well, I think later on in this tape, you'll</p> <p>13 see that he believes he was chasing odor.</p> <p>14 Q. Right.</p> <p>15 A. So is that a distraction? Not really. It's</p> <p>16 not focused on the task at hand completely. Still</p> <p>17 looking for odor. You can't blame the dog. But the</p> <p>18 handler does the right thing and says, you know, "Our</p> <p>19 focus is this vehicle, dog. Let's get back on it."</p> <p>20 Q. Okay. About the hand movements, so I think</p> <p>21 there's a couple we can kind of pause on. Let me go</p> <p>22 back a little bit. I'm going to try to get the number</p> <p>23 right. I think it's at 1:54. Hold on a second.</p> <p>24 (Video played)</p> <p>25 Q. Okay. So there's one. We just watched a</p>

<p style="text-align: right;">Page 186</p> <p>1 one-second clip at 1:54. It's kind of a palms up 2 movement towards the wheel well. What's going on 3 there? 4 A. He's just casting the dog. 5 Q. What does that mean? 6 THE REPORTER: Casting? 7 THE WITNESS: Casting. 8 THE REPORTER: No, was there 9 another word? 10 THE WITNESS: Like a casting. 11 THE REPORTER: Just casting? Okay. 12 THE WITNESS: Like a fishing rod. 13 THE REPORTER: I thought there was 14 another word I missed. 15 THE WITNESS: So I'm going to try to put 16 this in good context. If you take a chimpanzee and a 17 wolf and you point at something, they don't care. They 18 just don't care it's happening. But if you -- if you 19 do that with a dog, they will attend to what we're 20 attending to. And that's really a very big benefit for 21 us with dogs is that they have co-evolved with us to 22 work with us. And he's casting the dog so the dog's 23 attention is brought back into the work. It's a normal 24 technique that we have now ultimately discovered why it 25 works.</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. Did Max skip the wheel well? 2 A. It looks like he just ran past it. 3 Q. Let me just play that again to see. 4 (Video played) 5 THE WITNESS: It looks like he just 6 blasted past it. 7 Q. (BY MR. WINDHAM) Okay. So what you're saying 8 is Max went by the wheel well and Deputy Molina is 9 casting him back to the wheel well to smell it? 10 A. Correct. 11 Q. Okay. And that's standard? 12 A. That's not in the least bit unusual. 13 Q. Okay. 14 A. I'm trying to think. There might have been 15 one of me doing it with my old bomb dog on -- in a 16 building in this -- I can't remember where it's at. I 17 can show you me doing it. 18 Q. Okay. But this is -- this is casting behavior 19 is what you're saying? 20 A. Yes. 21 Q. Got it. What about the next time that this 22 comes up? So I think it's at 2:32. Let me -- let me 23 go there and if it's not right on, we will kind of find 24 it. 25 (Video played)</p>
<p style="text-align: right;">Page 187</p> <p>1 Q. You said that the casting brings Max back into 2 the work? 3 A. Correct. 4 Q. So -- 5 A. So we're attending to the car and for 6 whatever -- you know, Max went over there and something 7 diverted him and he wants him back into the focus of 8 the sniff, and so he casts him back in and the dog 9 goes, "Okay, we're attending to this because I do what 10 you do. We attend to this object." 11 Q. So maybe we should watch this portion again 12 because I'm wondering how it is that Max is unfocused 13 here. Let's start at 1:40 and just see how that looks. 14 So 1:40 through 1:54, just to see what Max is doing. 15 (Video played) 16 Q. Okay. So we just watched 1:40 through 1:54 17 and I don't see Max going away from the car. 18 A. He didn't, but he skipped a big chunk. So if 19 a dog is -- if a dog is running down the side, he's not 20 doing a real good job of sniffing, and particularly if 21 the window is going this way, he's going to need to get 22 his nose like under the wheel well. 23 And so the dog ran down this way, did a 24 nice little sniff, but he wanted the dog to come back 25 over here and sniff, and so he casted him back into it.</p>	<p style="text-align: right;">Page 189</p> <p>1 Q. Okay. So we just watched 2:34 to 2:36. 2 What's going on there? 3 A. Happy dog. 4 Q. What do you mean? 5 A. So what we saw is the dog go through -- and, 6 unfortunately, I can't really get a good view of what I 7 call the find -- 8 Q. Yeah. 9 A. -- because the camera didn't cover it very 10 well. But for me, a little more confirmation is that 11 he sits and then starts to -- starts to come higher 12 into drive. That only can happen when a dog is 13 anticipating something and the anticipation would come 14 from him identifying an assigned owner. 15 Q. Okay. So I just -- and this is just me slow 16 walking because I want to make sure -- it's like a few 17 seconds where a lot of things happen, so I want to just 18 -- 19 A. It is. 20 Q. -- try to break it down. Let's go to -- I'm 21 going to ask you about one-second clips. I'm sorry to 22 do that. 23 A. No, that's okay. 24 Q. Yeah. So let's start with -- we're going to 25 try to nail 2:33. Let's see how that goes.</p>

<p style="text-align: right;">Page 190</p> <p>1 (Video played)</p> <p>2 Q. Okay. So we're on 2:33. Do you have any</p> <p>3 sense, prior to 2:33, what exactly Max is doing and</p> <p>4 what exactly Molina's hand is doing?</p> <p>5 A. Right here at --</p> <p>6 Q. In the few seconds before 2:33, can you tell</p> <p>7 from the video what Max is doing and what Molina's hand</p> <p>8 is doing?</p> <p>9 A. It's difficult.</p> <p>10 Q. We can watch it again if you want.</p> <p>11 A. Just back it up --</p> <p>12 Q. Yeah.</p> <p>13 A. -- about four seconds.</p> <p>14 Q. Because, honestly, I can't, so I just want to</p> <p>15 know if you have a sense of what's going on. Let's try</p> <p>16 2:28 to 2:33.</p> <p>17 (Video played)</p> <p>18 Q. It's hard, right?</p> <p>19 A. I wish -- I wish he was facing his dog.</p> <p>20 Q. So that's 2:32 and I can't tell what's</p> <p>21 happening. Can you?</p> <p>22 A. No. All I see is his reflection.</p> <p>23 Q. So let's go to 2:33. And at this point, if</p> <p>24 I -- let's see if I can do this. So you see his hand</p> <p>25 in the reflection there -- sorry, on the screen and</p>	<p style="text-align: right;">Page 192</p> <p>1 A. I can't tell that.</p> <p>2 Q. Neither can I.</p> <p>3 A. And I've even tried to look at the reflections</p> <p>4 in the truck and I can't tell.</p> <p>5 Q. Okay. But it's -- it's fairly obvious at this</p> <p>6 point in time that, you know, he's trying to recast the</p> <p>7 dog. He hits the end of his leash, in the next like</p> <p>8 second you'll see the dog hit the end of the leash, and</p> <p>9 the dog goes, "No, no, no, stupidproofing," in effect.</p> <p>10 Q. Okay. Let me play one more second.</p> <p>11 A. Okay.</p> <p>12 Q. So we're just going to go to 2:34.</p> <p>13 (Video played)</p> <p>14 Q. Did you see Molina's hand kind of tapping the</p> <p>15 tire there? If not, I can play it again.</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. So we're going to --</p> <p>18 A. He's trying to cast the dog and the dog ain't</p> <p>19 moving.</p> <p>20 (Video played)</p> <p>21 Q. Okay. What did you say?</p> <p>22 A. He's trying to cast the dog, and this is --</p> <p>23 many handlers are taught to -- this is -- some people</p> <p>24 call it confirming. In other words, I'm going to try</p> <p>25 to make you go and if it's -- if you're correct, don't</p>
<p style="text-align: right;">Page 191</p> <p>1 then you see Max looking at him at 2:33, right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. So prior to that moment, we just don't</p> <p>4 know what his hand was doing and whether Max was</p> <p>5 sitting or not?</p> <p>6 A. No. And, you know -- and this is one</p> <p>7 of the -- when I watched, I was really hoping -- you</p> <p>8 know, push it over four feet. But to me, what's really</p> <p>9 interesting here is that, you know, Max becomes</p> <p>10 frustrated and he's obviously going, "Look, it's here,</p> <p>11 it's here, it's here, I've got odor, I've got odor,"</p> <p>12 and what we see going on.</p> <p>13 The handler is -- the handler didn't mess</p> <p>14 with the dog at all. He's going back to cast the dog</p> <p>15 again. And this is part -- we go back to training</p> <p>16 disobedience in the presence of odor, stupidproofing,</p> <p>17 at least what's what I call it. I'm sure people have</p> <p>18 other ways of talking about it.</p> <p>19 Q. Okay.</p> <p>20 A. And so he's continuing to do what he's doing,</p> <p>21 the same as the rest of the search, and yet the dog</p> <p>22 does something that's entirely different.</p> <p>23 Q. Are you able to say from the video whether</p> <p>24 Max, in the seconds -- few seconds prior to this moment</p> <p>25 at 2:33, Max looks over at Molina before sitting?</p>	<p style="text-align: right;">Page 193</p> <p>1 leave. And so sometimes people do that by pulling on</p> <p>2 the leash, sometimes people do it by -- by recasting</p> <p>3 the dog or even tapping on something to try to get the</p> <p>4 dog to move away from the odor if they are not</p> <p>5 100 percent sure.</p> <p>6 Q. Okay.</p> <p>7 A. And the dog here goes, "No way."</p> <p>8 Q. And then let's play to 2:42, which I think is</p> <p>9 where we -- where we ended before.</p> <p>10 (Video played)</p> <p>11 Q. So we just watched 2:34 to -- sorry, 2:33 to</p> <p>12 2:42. So at this point, it looks like Molina has</p> <p>13 decided to open the car and he has the alert, he needs</p> <p>14 to search it. Is that fair?</p> <p>15 A. I would assume that's what he's doing.</p> <p>16 Q. Okay.</p> <p>17 A. You would have to ask him.</p> <p>18 Q. Are you -- have you seen anything up to this</p> <p>19 point in the video, from 00:00 through 2:42, when he's</p> <p>20 opening the door, to indicate that Molina found any</p> <p>21 drugs?</p> <p>22 A. That Molina found any drugs?</p> <p>23 Q. Correct.</p> <p>24 A. No.</p> <p>25 Q. Okay. Including a trace amount?</p>



<p style="text-align: right;">Page 194</p> <p>1 A. He hasn't been in the vehicle yet.</p> <p>2 Q. Right. Next would be 2:42 to -- well, we'll</p> <p>3 see how far we have to go. We're going to play it for</p> <p>4 a little while.</p> <p>5 (Video played)</p> <p>6 Q. Okay. So before we continue, from 2:42</p> <p>7 to 3:35 is what we just watched, right? Does that --</p> <p>8 A. Yes.</p> <p>9 Q. -- sound right?</p> <p>10 A. Yes.</p> <p>11 Q. And -- I'm just trying to make a record for</p> <p>12 the court reporter.</p> <p>13 And in that period of time, it was just</p> <p>14 kind of Molina watching Max through the window in the</p> <p>15 car, right?</p> <p>16 A. Yes. All we see is the reflection of Molina.</p> <p>17 Q. Right. And Max is in the car at that point</p> <p>18 and I know you -- well, let me ask this.</p> <p>19 You can't see what Max is doing on the</p> <p>20 video, right?</p> <p>21 A. No, not at all.</p> <p>22 Q. So, generally speaking, in kind of the</p> <p>23 narcotics detection world, have you seen -- is this</p> <p>24 common for a handler to let a dog into the car and then</p> <p>25 close the door?</p>	<p style="text-align: right;">Page 196</p> <p>1 can't do those. In New Mexico, we treat your car like</p> <p>2 your home and so I would stop and get a -- get a paper.</p> <p>3 That's how --</p> <p>4 Q. (BY MR. WINDHAM) A warrant?</p> <p>5 A. Yes.</p> <p>6 Q. Okay, gotcha. So your understanding of maybe</p> <p>7 what's going on here is just looking to pinpoint the</p> <p>8 source of the odor?</p> <p>9 A. It would be an assumption, but --</p> <p>10 Q. That's fine.</p> <p>11 Okay. So let's -- let's keep going. So</p> <p>12 Deputy Babb, you can kind of see at 3:35, it's him</p> <p>13 approaching in the reflection, right?</p> <p>14 A. I can't identify him.</p> <p>15 Q. Do you see him there? That's okay.</p> <p>16 A. Yeah, I guess that is him.</p> <p>17 Q. All right. So he's going to start approaching</p> <p>18 Deputy Molina here.</p> <p>19 (Video played)</p> <p>20 Q. So we're now at 4:31 in the video and Deputy</p> <p>21 Molina and Deputy Babb just had a conversation, right?</p> <p>22 A. Yes.</p> <p>23 Q. At this point in the video, so from 00:00</p> <p>24 through 4:31, have you seen any evidence that Deputy</p> <p>25 Molina found drugs in the car?</p>
<p style="text-align: right;">Page 195</p> <p>1 A. Yeah. There are two kinds of sniffs that we</p> <p>2 do in the narcotics world generally -- or detector</p> <p>3 world in general. One of them is directed, that's what</p> <p>4 he did on the outside of that vehicle; and the other is</p> <p>5 undirected, you've got a confined space, just let the</p> <p>6 dog work.</p> <p>7 Q. Okay. So basically what's going on there is</p> <p>8 that Max is continuing to sniff around for the source</p> <p>9 of whatever he thinks the odor is?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. What's the purpose -- I know you can't</p> <p>12 kind of get in Molina's head. But, generally speaking,</p> <p>13 in the industry, what would be the purpose of</p> <p>14 continuing to use the dog after a confirmed alert on</p> <p>15 the vehicle?</p> <p>16 A. It's not uncommon for people to want to try to</p> <p>17 pinpoint a location. I will tell you that it's not the</p> <p>18 way that I do things. Once we have probable cause,</p> <p>19 we're done, and part of that is because of my state.</p> <p>20 We needed a paper to get in. We can't just do a</p> <p>21 Carroll doctrine sniff or search.</p> <p>22 THE REPORTER: A what?</p> <p>23 THE WITNESS: Carroll doctrine.</p> <p>24 THE REPORTER: Okay.</p> <p>25 THE WITNESS: U.S. versus Carroll. We</p>	<p style="text-align: right;">Page 197</p> <p>1 A. No.</p> <p>2 Q. Okay. And that includes a trace amount,</p> <p>3 right?</p> <p>4 A. He hasn't been in the car.</p> <p>5 Q. And I want to just re-watch that -- actually,</p> <p>6 let's move forward just a little bit and then we will</p> <p>7 come back. So we're at 4:31. We're going to go</p> <p>8 forward just a little bit.</p> <p>9 (Video played)</p> <p>10 Q. There's a nice clean picture of Max at 4:38,</p> <p>11 right?</p> <p>12 A. Okay.</p> <p>13 Q. And he's got -- that's a ball in his mouth,</p> <p>14 right?</p> <p>15 A. It's a Kong.</p> <p>16 Q. It's a Kong, okay. So at this point, Max has</p> <p>17 been rewarded a toy, right?</p> <p>18 A. Yes.</p> <p>19 Q. And he's in the car, he has been rewarded a</p> <p>20 toy and Deputy Molina hasn't found any drugs so far,</p> <p>21 right?</p> <p>22 A. I think that's an answer for Deputy Molina at</p> <p>23 this point when they're in the car.</p> <p>24 Q. Okay. But you haven't -- so far you haven't</p> <p>25 seen any evidence he has?</p>



<p style="text-align: right;">Page 198</p> <p>1 A. No.</p> <p>2 Q. And you're not aware of any evidence that he</p> <p>3 had?</p> <p>4 A. The only thing that I have at this point in</p> <p>5 time is that he has a deployment report that says he</p> <p>6 found trace amounts.</p> <p>7 Q. Well, I was going to ask you about that next,</p> <p>8 actually. So you reviewed his report where he claims</p> <p>9 to have found a trace amount of marijuana in the car,</p> <p>10 right?</p> <p>11 A. Yes.</p> <p>12 Q. In conducting your analysis for this report</p> <p>13 and forming your opinions, was your assumption that</p> <p>14 Deputy Molina was telling the truth about that?</p> <p>15 A. I don't think it matters.</p> <p>16 Q. Okay. Why don't you think it matters?</p> <p>17 A. Dog behavior.</p> <p>18 Q. What do you mean?</p> <p>19 A. Dogs can't lie. And the dog does everything</p> <p>20 he is trained to and he has got a very high percentage</p> <p>21 of success. We can recognize the fact that dogs locate</p> <p>22 odor, not substance, and so this dog was consistent</p> <p>23 with his training in his previous deployments and so</p> <p>24 that is what I'm looking at.</p> <p>25 Q. Okay. I want to ask you about some of those</p>	<p style="text-align: right;">Page 200</p> <p>1 A. Nothing.</p> <p>2 Q. What do you mean, nothing?</p> <p>3 A. An alert does not always end up in an</p> <p>4 indication. An alert can be -- they may not be able to</p> <p>5 get to what they feel is source. The odor may be</p> <p>6 blowing all over the place and they never can get to a</p> <p>7 place that they feel is the highest concentration in</p> <p>8 the area. And so they may not give an indication, but</p> <p>9 they may have given an overwhelming alert.</p> <p>10 Q. Well, I don't -- I think I'm just not</p> <p>11 understanding your testimony because I thought you just</p> <p>12 told me that he can't do one without the other?</p> <p>13 A. He cannot do an indication without an alert.</p> <p>14 He can have an alert that stands alone.</p> <p>15 Q. I see what you're saying, thank you. Okay.</p> <p>16 Which leads me back to my question about lying. So</p> <p>17 your point was just that he can't have an alert without</p> <p>18 an indication? I might be --</p> <p>19 A. No, no, no, cannot have an indication without</p> <p>20 an alert.</p> <p>21 Q. Okay, got it. Is your position today that</p> <p>22 dogs can never be wrong about whether there are drugs</p> <p>23 in a car?</p> <p>24 A. Dogs do not know quantity. They only know</p> <p>25 odor.</p>
<p style="text-align: right;">Page 199</p> <p>1 training and deployment records, but let's take a quick</p> <p>2 break and then we will come back to it.</p> <p>3 (Recess from 2:40 p.m. to 2:48 p.m.)</p> <p>4 Q. (BY MR. WINDHAM) We're back on the record,</p> <p>5 Mr. Sheldahl. Do you recognize you're still under</p> <p>6 oath?</p> <p>7 A. Yes.</p> <p>8 Q. All right. I was interested in something that</p> <p>9 you said just before the break. I don't know if I have</p> <p>10 the phrasing exactly right, but it involved the --</p> <p>11 something like dogs can't lie. Is that what the phrase</p> <p>12 was?</p> <p>13 A. Yes.</p> <p>14 Q. So is your point that dogs literally never lie</p> <p>15 to their handler?</p> <p>16 A. I think maybe a better way to do that is to</p> <p>17 define it as they cannot change -- they cannot have an</p> <p>18 alert and an indication absent from one another.</p> <p>19 Q. So you think it's impossible -- I'm just</p> <p>20 trying to make sure I get this. You think it's</p> <p>21 impossible for a dog to alert, but not indicate?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. If you saw on a deployment record that</p> <p>24 a dog had alerted, but not indicated, the handler wrote</p> <p>25 that down, what would your reaction be?</p>	<p style="text-align: right;">Page 201</p> <p>1 Q. Is it your position that dogs are infallible?</p> <p>2 A. No.</p> <p>3 Q. Okay. And what about gambling, how does that</p> <p>4 factor into the question of fallibility?</p> <p>5 A. Gambling would be an attempt to provide an</p> <p>6 indication without an alert and it should be identified</p> <p>7 by the handler or -- or the people that are coaching</p> <p>8 them.</p> <p>9 Q. Okay. So gambling is the dog having its own</p> <p>10 motivation to manipulate the handler?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. So I would like to -- I think before</p> <p>13 the break also, you had a reference to Max having -- I</p> <p>14 forget exactly the way you phrased it. Something about</p> <p>15 his proficiency. Do you remember what you said there?</p> <p>16 A. Yeah, he was -- looking at his records, and I</p> <p>17 didn't get an exact number, he is highly proficient,</p> <p>18 looking at all of his records.</p> <p>19 Q. Okay. So I wanted to kind of drill down on</p> <p>20 that a little bit. You didn't run any numbers or</p> <p>21 anything?</p> <p>22 A. I didn't crunch a bunch numbers. It's fairly</p> <p>23 obvious this is a dog up there in upper 80s, lower 90s.</p> <p>24 Q. You think it was obvious he was in his upper</p> <p>25 80s, lower 90s?</p>

<p style="text-align: right;">Page 202</p> <p>1 A. Yes, yes.</p> <p>2 Q. Your report says 90 percent correct, right?</p> <p>3 A. Estimate, that's an estimate.</p> <p>4 Q. That was an estimate?</p> <p>5 A. That was an estimate.</p> <p>6 Q. And by the same token, it could have been</p> <p>7 80 percent?</p> <p>8 A. 89 or 91.</p> <p>9 Q. Okay. When you wrote that in your report, you</p> <p>10 hadn't created any kind of tables like we were talking</p> <p>11 about earlier?</p> <p>12 A. No, I just did some rough counting in my head.</p> <p>13 Q. Okay.</p> <p>14 A. I didn't sit and do checkmarks and -- that</p> <p>15 would take me four or five hours --</p> <p>16 Q. Okay.</p> <p>17 A. -- of check marking. Let's look at the</p> <p>18 last -- last couple of months. Okay, this looks like</p> <p>19 about 90 percent.</p> <p>20 Q. Okay. So your 80 to 90 percent estimation was</p> <p>21 about the last few months of the records you reviewed?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. So you did not make that estimation</p> <p>24 based on Max's early records, for example?</p> <p>25 A. No, I just looked at the -- at the latest</p>	<p style="text-align: right;">Page 204</p> <p>1 A. I don't remember.</p> <p>2 Q. Okay, you don't remember. That's fine.</p> <p>3 A. There's an awful lot of paper here.</p> <p>4 Q. Do you know whether this 80 to 90 percent</p> <p>5 figure that you came up with was a figure based on the</p> <p>6 months immediately prior to this incident?</p> <p>7 A. No, it was just the numbers I was looking at,</p> <p>8 counting in my head.</p> <p>9 Q. Okay. Do you happen to know, sitting here</p> <p>10 today, what Max's percent correctness, to use the</p> <p>11 phrase you used in your report, would have been in the</p> <p>12 months prior to this incident?</p> <p>13 A. No.</p> <p>14 Q. I want to show you an exhibit. This is going</p> <p>15 to be Exhibit 107.</p> <p>16 MR. WINDHAM: We're going to be on tab H,</p> <p>17 Josh. Oh, this has been previously marked as</p> <p>18 Exhibit 26. That saves us some time. So we're handing</p> <p>19 you --</p> <p>20 MS. HEBERT: So not 107?</p> <p>21 MR. WINDHAM: Yep.</p> <p>22 MS. HEBERT: But it's what's been</p> <p>23 previously marked an exhibit?</p> <p>24 MR. WINDHAM: Uh-huh.</p> <p>25 MS. HEBERT: Okay.</p>
<p style="text-align: right;">Page 203</p> <p>1 ones, and I don't remember the dates --</p> <p>2 Q. That's okay.</p> <p>3 A. -- on those, and looked at whether or not the</p> <p>4 dog was proficient. Looking way back, on -- you know,</p> <p>5 recent history is important. You know, the dog may be</p> <p>6 ill and his proficiency plummets, training may be</p> <p>7 deficient.</p> <p>8 Q. The --</p> <p>9 A. And so what's important is -- is not what</p> <p>10 happened two years ago, three years ago.</p> <p>11 Q. Sure.</p> <p>12 A. It's what's happening now.</p> <p>13 Q. Or at least, in this case, what was happening</p> <p>14 right before this incident, right?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. Did you look at those records, what was</p> <p>17 happening right before this incident?</p> <p>18 A. I looked at the ones that -- so they were in</p> <p>19 order and I looked at the ones on either side of</p> <p>20 this deployment.</p> <p>21 Q. You looked at the ones on either side of this</p> <p>22 deployment?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Is that a different set of records than</p> <p>25 the ones that were the most recent in his file?</p>	<p style="text-align: right;">Page 205</p> <p>1 Q. (BY MR. WINDHAM) So we have just handed you</p> <p>2 what's been previously marked as Exhibit 26. Just take</p> <p>3 a second to look through this and let me know if you</p> <p>4 recognize it.</p> <p>5 A. Yes.</p> <p>6 Q. What is this?</p> <p>7 A. It is a certificate for Martin Molina, 350</p> <p>8 hours of training; an NCATS certificate of achievement</p> <p>9 for achieving patrol and narcotics standards from</p> <p>10 May '23, another one from May '21 and another one from</p> <p>11 May '22.</p> <p>12 Q. When your report references Max's over 350</p> <p>13 hours of training and his certifications, were you</p> <p>14 relying entirely on these documents?</p> <p>15 A. No, there were statements about 352 hours --</p> <p>16 Q. Okay.</p> <p>17 A. That came from -- came from a deposition, I</p> <p>18 believe --</p> <p>19 Q. Okay.</p> <p>20 A. -- on Molina.</p> <p>21 Q. Gotcha. About the -- let's see here. So this</p> <p>22 incident, the Mr. Schott incident, was on March 16th</p> <p>23 of 2022, right?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. And it looks like the most recent</p>

<p style="text-align: right;">Page 206</p> <p>1 certification that Max and Molina had prior to</p> <p>2 March 16th of 2022 would have been May of 2021; is that</p> <p>3 fair?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. So there's a roughly ten-month period</p> <p>6 between Max and Molina's last NCATS certification and</p> <p>7 Max's deployment on Mr. Schott's vehicle?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Another exhibit for you. So this is</p> <p>10 going to be I. All right. We're handing you what's</p> <p>11 been previously marked as Exhibit 30. So take a moment</p> <p>12 to look through that for me.</p> <p>13 A. Okay.</p> <p>14 Q. Let me know when you're ready.</p> <p>15 A. Ready.</p> <p>16 Q. All right. Did you look at the ten-month</p> <p>17 period between May of 2021 and March of 2022 -- well,</p> <p>18 actually, I need to back up.</p> <p>19 What is this document?</p> <p>20 A. These are basically training reports.</p> <p>21 Q. Okay. Did you -- are you aware if you</p> <p>22 reviewed any training reports, other than the ones in</p> <p>23 front of you, for this case?</p> <p>24 A. I flipped through every one of these.</p> <p>25 Q. Okay. These are the ones you looked at?</p>	<p style="text-align: right;">Page 208</p> <p>1 MR. WINDHAM: 2070.</p> <p>2 THE WITNESS: Okay.</p> <p>3 Q. (BY MR. WINDHAM) Okay. And just so that</p> <p>4 we're clear, do you see any training record from Deputy</p> <p>5 Molina prior to this date in May? I don't, but I just</p> <p>6 want to make sure you don't either.</p> <p>7 A. Prior to which date?</p> <p>8 Q. This May 4th of 2021. I just want to make</p> <p>9 sure of the earliest date in May of 2021.</p> <p>10 A. Well, there's one from May 12th and</p> <p>11 April 27th.</p> <p>12 Q. Okay. So we're at the earliest date in May</p> <p>13 of 2021 when we're on this May 5th -- or May 4th.</p> <p>14 A. Okay.</p> <p>15 Q. Okay. So let's just start -- I want to kind</p> <p>16 of walk through these with you and count up some</p> <p>17 numbers and then ask you about them.</p> <p>18 So it looks like this is entered by</p> <p>19 Deputy Molina, right, this is a Deputy Molina K9</p> <p>20 training detail report, fair?</p> <p>21 A. Okay.</p> <p>22 Q. And -- well, do you agree with that?</p> <p>23 A. Yeah, this is what I perceived as that.</p> <p>24 Q. Yeah, just want to make sure.</p> <p>25 And it looks like it -- oh, sorry. So</p>
<p style="text-align: right;">Page 207</p> <p>1 A. Yes.</p> <p>2 Q. Okay. So we're going to try something that</p> <p>3 may be a little funky, and I apologize and I ask you to</p> <p>4 kind of work with me here.</p> <p>5 A. Okay.</p> <p>6 Q. Let's see if the technology plays along. So</p> <p>7 I've put up on the screen, just for the record, an</p> <p>8 Excel -- blank Excel sheet with some dates, and at the</p> <p>9 top of the Excel sheet, there's a row that says date,</p> <p>10 hours, sniffs, blanks, proofing, distractions -- and I</p> <p>11 will -- I will eliminate that one, because why not, it</p> <p>12 makes it simpler on us -- and there's a total at the</p> <p>13 very bottom.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So let's just go through this exhibit</p> <p>17 together and I want to see if we can kind of come up</p> <p>18 with some figures for this ten-month period between May</p> <p>19 of 2021 and March of 2022; is that fair?</p> <p>20 A. Okay.</p> <p>21 Q. Okay. So let's start with -- I'll find the</p> <p>22 right page for you. May 4th, 2021, which is on</p> <p>23 Bates 2070, if you want to use the numbers in the</p> <p>24 bottom right corner.</p> <p>25 MR. FRIGERIO: What Bates did you say?</p>	<p style="text-align: right;">Page 209</p> <p>1 there's a time start and time ended here, right?</p> <p>2 A. Yes.</p> <p>3 Q. And this is a weekly group training he engaged</p> <p>4 in that involves narcotics training, right?</p> <p>5 A. Yes.</p> <p>6 Q. So the time started would have been 8:00 a.m.</p> <p>7 and the time ended would have been 2:30 p.m., right?</p> <p>8 A. Yes.</p> <p>9 Q. So that's six hours and 30 minutes; is that</p> <p>10 fair --</p> <p>11 A. Yes.</p> <p>12 Q. -- for this training session? Okay. So I'm</p> <p>13 going to put 6.5 in this first box next to May 4th</p> <p>14 of 2021 for hours. I'm just going to fill this sheet</p> <p>15 out as we go and if I -- if you see me make an error or</p> <p>16 you disagree with what I'm doing, just tell me. I just</p> <p>17 want to get it right. And it looks to me like there</p> <p>18 are boxes on the left-hand side that say one, one, one,</p> <p>19 one, one, over and over again.</p> <p>20 Do you see those --</p> <p>21 A. Yes.</p> <p>22 Q. -- under training find?</p> <p>23 So those, I take it, but tell me if you</p> <p>24 read this different, to be drills that Deputy Molina</p> <p>25 ran with Max sniffing a specific structure?</p>

<p style="text-align: right;">Page 210</p> <p>1 A. I assume it is a search assigned --</p> <p>2 Q. Okay.</p> <p>3 A. -- by whoever was settling up training.</p> <p>4 Q. Yeah.</p> <p>5 A. That's what I'm assuming.</p> <p>6 Q. Okay. So it looks to me -- we can call them</p> <p>7 searches, though, if that -- do you want to call them</p> <p>8 searches or sniffs?</p> <p>9 A. Searches or sniffs, same thing.</p> <p>10 Q. Okay. I'll call them sniffs just because</p> <p>11 that's what I have on the spreadsheet.</p> <p>12 A. Okay.</p> <p>13 Q. So it looks to me like there were -- one, two,</p> <p>14 three, four, five, six sniffs in this training session;</p> <p>15 is that fair?</p> <p>16 A. Yes.</p> <p>17 Q. It looks to me like there's only one blank of</p> <p>18 the six; is that fair?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Is there any note that you can see on</p> <p>21 this form that proofing was performed?</p> <p>22 A. No, and I don't know that they call it that.</p> <p>23 Q. Okay. Well, I guess my question is -- I mean,</p> <p>24 we can use a different term if you want, but my</p> <p>25 question is really do you see an indication on this</p>	<p style="text-align: right;">Page 212</p> <p>1 they were in environments that would have included</p> <p>2 diversions and distractions, just by their nature.</p> <p>3 Q. Okay.</p> <p>4 A. I think they should have recorded those</p> <p>5 things, and it looks like they did not.</p> <p>6 Q. Okay. So at least the report, though,</p> <p>7 indicates that there were no --</p> <p>8 A. There's nothing that they noted.</p> <p>9 Q. Okay.</p> <p>10 A. But, you know, your environment --</p> <p>11 Q. I will just say "noted distractions." Is that</p> <p>12 more accurate?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. I don't want to put words in your mouth</p> <p>15 or anything. So let's do "noted distractions, none."</p> <p>16 All right. I'm just going to do this for</p> <p>17 all of Molina's training from here until the incident,</p> <p>18 so let's flip to July 27th of 2021, I believe is the</p> <p>19 next one. Tell me if I'm -- you see another that's --</p> <p>20 A. The wrong direction, I think.</p> <p>21 Q. And I'm focusing -- just so you know, I'm</p> <p>22 focusing just on narcotics. So if you see a training</p> <p>23 that's not narcotics, I'm not asking you about that.</p> <p>24 I'm trying to compile numbers for narcotics trainings.</p> <p>25 So the next narcotics one I see is July 27th of 2021.</p>
<p style="text-align: right;">Page 211</p> <p>1 form that there was hemp or cash or another legal</p> <p>2 substance that they wanted to train him not to alert on</p> <p>3 here?</p> <p>4 A. There's nothing indicated here.</p> <p>5 Q. Okay. And I'm just going to call that</p> <p>6 proofing, but if you want me to use a different word,</p> <p>7 you're welcome to give me one.</p> <p>8 A. Proofing would be that the dog has been</p> <p>9 showing a propensity or a potential propensity for</p> <p>10 finding things he was not assigned.</p> <p>11 Q. Okay.</p> <p>12 A. And that's what proofing is.</p> <p>13 Q. Okay.</p> <p>14 A. Everything else would be just diversions and</p> <p>15 distractions.</p> <p>16 Q. How about I just put "hemp/cash," does that</p> <p>17 work? So the question is, is there any indication on</p> <p>18 this report that there was hemp or cash placed in the</p> <p>19 training area?</p> <p>20 A. No.</p> <p>21 Q. You see none, right? And then distractions,</p> <p>22 do you see any evidence of distractions? I see boxes</p> <p>23 for distractions and they all look blank to me, right?</p> <p>24 A. I noticed that when we were -- when I was</p> <p>25 reviewing these things and there's a lot of times when</p>	<p style="text-align: right;">Page 213</p> <p>1 That would be Bates 2058.</p> <p>2 A. Let me get these in order.</p> <p>3 Q. Take your time. I know this is cumbersome.</p> <p>4 A. Okay, I'm on 2058.</p> <p>5 Q. Okay. Did you see any other narcotics</p> <p>6 trainings from that --</p> <p>7 A. I did not.</p> <p>8 Q. Okay, got it. And how about we do this. You</p> <p>9 just tell me, as we go through, if you see any</p> <p>10 narcotics trainings that I'm missing, otherwise I'll</p> <p>11 have to ask you every time.</p> <p>12 A. Okay.</p> <p>13 Q. All right. And so this July 27th, 2021, it</p> <p>14 looks like it started at 8:30 a.m. and then went to</p> <p>15 2:30 p.m., right, so that will be six hours; is that</p> <p>16 fair?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. It looks like there were one, two,</p> <p>19 three, four, five sniffs; is that fair?</p> <p>20 A. Yes.</p> <p>21 Q. And then it looks like there was no blank this</p> <p>22 time; is that fair?</p> <p>23 A. Yeah, I don't see a notation of any -- any</p> <p>24 blank.</p> <p>25 Q. And just to kind of jog your memory, if you go</p>

<p style="text-align: right;">Page 214</p> <p>1 back to that -- that first one we reviewed, you don't  2 have to flip it, but there was a bracket that said --  3 A. Blank.  4 Q. -- that said "blank," so -- so none there, and  5 then hemp/cash, none noted?  6 A. No.  7 Q. And then distractions, none noted, right? Is  8 that correct?  9 A. Correct.  10 Q. I'm sorry, I know this is going to be a little  11 repetitive. So now we're going to go to -- let me find  12 it -- 8/17/2021, which is going to be Bates --  13 MR. FRIGERIO: Steve, are you there?  14 MR. BARRON: I rejoined. Thanks.  15 MR. FRIGERIO: Oh, okay.  16 MR. WINDHAM: Hey, Stephen.  17 Q. (BY MR. WINDHAM) All right. Bates 2053, tell  18 me when you're there.  19 A. So 2055 --  20 Q. Yeah.  21 A. -- has some narcotics training on it.  22 Q. Oh, thank you. Yeah, that's the one I meant  23 to go to, 8/17. So you're doing exactly what I hoped  24 you would do is correct me.  25 All right. So time started, 8:30, time</p>	<p style="text-align: right;">Page 216</p> <p>1 A. Yes.  2 Q. Okay. 9/21, I believe is the next one.  3 That's going to be Bates 2049?  4 A. We have 2053 also.  5 Q. 2053, cool, let me add that. Okay, so -- oh,  6 there's two on 8/17. I think this is a duplicate.  7 Tell me if you agree with that. I think it's exactly  8 the same, it's just labeled --  9 A. Okay. I was just looking at the number at the  10 bottom.  11 Q. Yeah, no, I appreciate it.  12 A. Yes, it looks like they are the same.  13 Q. Okay, that's what I thought. That's probably  14 why I didn't note it. So back to 9/21, that's going to  15 be 2049. Let me know when you're there.  16 A. Got it.  17 Q. Okay. Hours, it looks like that's from 8:30  18 to 2:00 p.m., so that's going to be 5-1/2 hours. All  19 right?  20 A. Okay.  21 Q. Yeah, 5-1/2 hours.  22 Sniffs, I see four. Do you see four?  23 A. Yes.  24 Q. Blanks, I see none here. Do you see none?  25 A. I do not see any.</p>
<p style="text-align: right;">Page 215</p> <p>1 ended, 2:30, so that's going to be six hours again,  2 right?  3 A. Yes.  4 Q. Sniffs, one, two, three, four, five, six  5 sniffs, right?  6 A. Yes.  7 Q. And then I don't see any blanks, do you?  8 A. No.  9 Q. I don't see any hemp or cash noted, do you?  10 A. No.  11 Q. And I don't see any distractions noted, do  12 you?  13 A. They do a very poor job of noting what  14 distractions would be there. I'm looking at wall  15 lockers that are heavily used with human odor, those  16 are diversions and distractions, and yet they are  17 not -- they are not noting them as diversions and  18 distractions, which they should be doing.  19 Q. Okay.  20 A. I think it's just a -- maybe they could have  21 been more detailed here.  22 Q. Okay. Now, I believe there are some where  23 they do note it, so I'm just going to -- I'm going to  24 record where they do and where they don't, if that's  25 fair.</p>	<p style="text-align: right;">Page 217</p> <p>1 Q. No hemp or cash noted, right?  2 A. Correct.  3 Q. And then it looks like there are distractions  4 noted here. I see -- tell me if I'm summarizing this  5 right, it looks like animal and people are the  6 distractions noted.  7 A. That's what it looks like to me.  8 Q. So let's go to the next one.  9 A. Hang on.  10 Q. Sorry, go ahead.  11 A. Is "cat" an animal?  12 Q. I think that means category, but tell me if  13 you're reading that differently.  14 A. I don't know. Maybe it means --  15 Q. A cat?  16 A. -- cat poop.  17 Q. Okay. Are you -- tell me if you're  18 comfortable with me writing "animal" and "people." I'm  19 just writing "yes" -- I'm just writing "yes" for  20 distractions.  21 A. Okay, yeah.  22 Q. So I'm not even specifying on the spreadsheet.  23 I'm not getting that detailed here. For 10/5, the next  24 one, I believe, I see Martin Molina, 2047 will be the  25 number. Let me know when you're there.</p>

<p style="text-align: right;">Page 218</p> <p>1 A. Yes.</p> <p>2 Q. So this one would be 8:00 a.m. to 2:30 p.m.</p> <p>3 and that's going to be 6-1/2 hours, right?</p> <p>4 A. Yes.</p> <p>5 Q. And he only did one sniff, right?</p> <p>6 A. That's what it looks like.</p> <p>7 Q. And then there's -- I don't see a reference to</p> <p>8 "blank" in the way we did for prior forms, right?</p> <p>9 A. Correct.</p> <p>10 Q. But it doesn't say what narcotic was used and</p> <p>11 there's nothing about hemp or cash or a reference to</p> <p>12 distractions, right? Do you agree?</p> <p>13 A. I'm not quite understanding what he wrote.</p> <p>14 Q. Okay, that's fine. Take your time.</p> <p>15 A. It almost looks like he did a narcotics</p> <p>16 search, but it was a blank.</p> <p>17 Q. You read this to be a blank?</p> <p>18 A. This is -- this is a blank.</p> <p>19 Q. Okay. And that's based on what, the note?</p> <p>20 A. Well, if you look in here and see he did --</p> <p>21 bracketed an open area and that it was a narcotics</p> <p>22 training and there's no narcotics noted.</p> <p>23 Q. Okay. What -- just so I'm understanding what</p> <p>24 that would mean, what would it mean to bracket an open</p> <p>25 area?</p>	<p style="text-align: right;">Page 220</p> <p>1 A. None.</p> <p>2 Q. But there are distractions noted, right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Let's move to the next one, 10/13</p> <p>5 of 2021. It's just on the next page. So on this one,</p> <p>6 it looks like this is an hour; is that fair?</p> <p>7 A. That's what it looks like.</p> <p>8 Q. And then it looks like he performed seven</p> <p>9 sniffs, one, two, three, four, five, six, seven; is</p> <p>10 that fair?</p> <p>11 A. That's what he notes.</p> <p>12 Q. Okay. Do you find -- you said that with a</p> <p>13 voice that made me wonder if you're thinking something.</p> <p>14 A. I'm just trying to read what --</p> <p>15 Q. Okay. That's okay.</p> <p>16 A. -- read what he did.</p> <p>17 Q. Okay, got it. And I don't see any blanks</p> <p>18 here, do you?</p> <p>19 A. No.</p> <p>20 Q. And then no cash or hemp noted, right?</p> <p>21 A. No.</p> <p>22 Q. And then do you see any distractions noted? I</p> <p>23 don't --</p> <p>24 MR. FRIGERIO: Objection, form. On</p> <p>25 page 2043, they are talking about a blank, five cars</p>
<p style="text-align: right;">Page 219</p> <p>1 A. Again, you have to make an assumption that he</p> <p>2 was given a task to go look for narcotics in an -- in</p> <p>3 an area on the ground, like as if somebody had tossed</p> <p>4 it, and it was a blank and it shows here that not --</p> <p>5 training non-find tasks, one.</p> <p>6 Q. Okay, training non-find tasks, I see. So the</p> <p>7 idea would be this is a non-find, we're not looking for</p> <p>8 a find?</p> <p>9 A. Correct.</p> <p>10 Q. Okay, got it. So I'm going -- I'm going to</p> <p>11 agree with that. That's going to be -- that's going to</p> <p>12 be a blank. 10/12 of 2021, I think is the next one.</p> <p>13 That's going to be 2045.</p> <p>14 A. Yes.</p> <p>15 Q. Okay. That's 8:00 a.m. to 2:30 p.m., which is</p> <p>16 6-1/2 hours, right?</p> <p>17 A. Yes.</p> <p>18 Q. Three sniffs, correct?</p> <p>19 A. Yes.</p> <p>20 Q. No blanks noted, right?</p> <p>21 A. Multiple distractors.</p> <p>22 Q. Right. So just to go through the order, no</p> <p>23 blanks noted, right?</p> <p>24 A. I don't see a blank listed.</p> <p>25 Q. And then no hemp or cash noted, right?</p>	<p style="text-align: right;">Page 221</p> <p>1 with four finds.</p> <p>2 THE WITNESS: This is one of the problems</p> <p>3 with this recordkeeping is that although he had a find</p> <p>4 in a car, we don't know what his assignment was. Was</p> <p>5 it to go search six cars and one of them had a find or</p> <p>6 was it to search one car with one find?</p> <p>7 For me, this is a difficult thing for me</p> <p>8 to determine numbers from and that's why I did</p> <p>9 estimates.</p> <p>10 Q. (BY MR. WINDHAM) Totally. I understand.</p> <p>11 A. And so when I look at this, I'm like, "I would</p> <p>12 teach you to do different recordkeeping."</p> <p>13 Q. I understand. And I'm just -- honestly, I'm</p> <p>14 asking what the forms note. I'm not asking what you</p> <p>15 think happened or you're in his head or anything like</p> <p>16 that. If the reality of what happened is different</p> <p>17 than what the forms say, I'm not going to hold you to</p> <p>18 it.</p> <p>19 A. Yeah.</p> <p>20 Q. I just want to come up with the numbers of</p> <p>21 what the forms say.</p> <p>22 MR. WINDHAM: So I take your point,</p> <p>23 Charles.</p> <p>24 Q. (BY MR. WINDHAM) It looks like there's one</p> <p>25 blank noted; is that fair?</p>



<p style="text-align: right;">Page 222</p> <p>1 A. The format of these is very difficult for me  2 to look at and have any real determination as to what  3 they're doing.  4 Q. I'm asking what's noted. So it looks to me --  5 A. Yeah, it's what's noted.  6 Q. I see the word "blank" one time. Do you see  7 the word "blank" one time, one blank?  8 A. One blank.  9 Q. Okay, thank you.  10 And then I see no distractions noted,  11 right?  12 A. Correct.  13 Q. All right. 10/19 -- thanks -- that's 2041.  14 So it looks like this training was 6-1/2 hours, right?  15 A. Yes.  16 Q. It looks like there were four sniffs  17 performed, right?  18 A. Yes.  19 Q. It looks like there are no blanks noted; is  20 that fair?  21 A. Yeah, I don't see any blanks.  22 Q. And then no cash or hemp noted, right?  23 A. No.  24 Q. And no -- actually, it looks like there are  25 distractions noted, correct?</p>	<p style="text-align: right;">Page 224</p> <p>1 having humans and human odor in the area is a -- is a  2 distractor, is a diversion.  3 Q. Okay.  4 A. We find that dogs, on occasion, can do things  5 like learn in conjunction with their assigned odors.  6 The odor of latex gloves, so every time they put out  7 finds, latex gloves are used. They are amazingly adept  8 at trying to figure us out and so we have to  9 continually do things, whether that's go do sniffs in  10 areas we know are terribly contaminated, which is my  11 strategy, or we have to put out those diversions and  12 distractions.  13 Q. Okay.  14 A. I can tell you that what I wish here that they  15 had is they had given a description of the location.  16 I'm sure they know the locations off the top of their  17 head, but I wouldn't know, and then the environment  18 they were working in, it would have been nice for me to  19 evaluate this stuff.  20 Q. Yeah.  21 A. It's very difficult to make an evaluation from  22 this, other than that they invested time and obviously  23 had structured training.  24 Q. Okay. So at least as you sit here today,  25 you're looking through these forms and you've reviewed</p>
<p style="text-align: right;">Page 223</p> <p>1 A. Quite a few distractions.  2 Q. Okay, I'm going to put yes for that.  3 10/21, which is on 2038. We're making  4 our way down. The time for this would be -- well, 9:29  5 to 1:00 p.m. Is it going to give you heartburn if I  6 round to 9:30?  7 A. I think that's fine.  8 Q. Okay. So it's going to be, let's see, three  9 hours and 30 minutes; is that fair?  10 A. Yes.  11 Q. Okay. Sniffs, I see four; is that fair?  12 A. Yes.  13 Q. And no blanks noted, right?  14 A. Yes, nothing noted.  15 Q. No cash or hemp noted, right?  16 A. Correct.  17 Q. And then I just had a question about -- it  18 looks like there are distractions here, right?  19 A. There are.  20 Q. And I just didn't really get -- obviously,  21 you're trying to read these forms the same way I am,  22 but what would it mean for human order to be a  23 distraction, just so I can kind of get it?  24 A. Well, in placing out aids, whether we like it  25 or not, we're placing human odor in the area. And so</p>	<p style="text-align: right;">Page 225</p> <p>1 all of them, right?  2 A. I've flipped through every single one of these  3 things.  4 Q. Yeah. And you just -- you can't draw  5 conclusions about what actually went on in these  6 trainings based on these forms?  7 A. You can draw some basic conclusions.  8 Q. Okay.  9 A. But the details are -- are escaping me.  10 Q. Okay. What are the basic conclusions that you  11 can draw?  12 A. That they went out and they did -- they had a  13 find set up for him, they were able to go out and do  14 the work, they noted whether or not they had mistakes  15 made and whether or not they found what -- the items  16 that were placed out for them to find.  17 What's lacking is a description of the  18 environment --  19 Q. Okay.  20 A. -- and a description of the search. I suspect  21 that, built into this, we have a whole bunch of blanks  22 that aren't even recorded. Go do those three vehicles,  23 get two blanks and one find.  24 Q. Okay.  25 A. I suspect, I don't know that for sure, but</p>

<p style="text-align: right;">Page 226</p> <p>1 that is generally the structure that I see most</p> <p>2 departments work with.</p> <p>3 Q. Okay. But you don't know one way or the</p> <p>4 other, do you?</p> <p>5 A. No. It's not -- it's not possible from these</p> <p>6 to know one way or the other.</p> <p>7 Q. And so, too, it wouldn't be possible for a K9</p> <p>8 unit supervisor reviewing these forms to know that</p> <p>9 either, would it?</p> <p>10 A. Unless he observed training.</p> <p>11 Q. Correct. Okay. So unless a K9 unit</p> <p>12 supervisor was actually at these trainings, he wouldn't</p> <p>13 be able to look at these forms and fully understand</p> <p>14 what went on, would he?</p> <p>15 A. He would probably have to ask questions.</p> <p>16 Q. Got it. And who would he ask?</p> <p>17 A. Probably whoever is in charge of training.</p> <p>18 Q. The trainer?</p> <p>19 A. Whoever the assigned trainer is.</p> <p>20 Q. Got it. Okay. So what about the next one?</p> <p>21 We're just going to finish this out. 11/2 of '21, so</p> <p>22 that would be 2035, I believe. It looks like this one</p> <p>23 is --</p> <p>24 A. Hold on.</p> <p>25 Q. Oh, sorry, go ahead. Take your time.</p>	<p style="text-align: right;">Page 228</p> <p>1 right?</p> <p>2 A. Yes.</p> <p>3 Q. No blanks noted, correct?</p> <p>4 A. None noted.</p> <p>5 Q. No cash or hemp noted, right?</p> <p>6 A. Correct.</p> <p>7 Q. And then no distractions noted, right?</p> <p>8 A. Correct.</p> <p>9 Q. 11/16 of 2021, which is on 2029. Okay.</p> <p>10 Hours, it looks like this is 6-1/2 hours, right?</p> <p>11 A. Correct.</p> <p>12 Q. It looks like there are four sniffs noted,</p> <p>13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. No blanks noted, right?</p> <p>16 A. None noted.</p> <p>17 Q. No cash or hemp noted, right?</p> <p>18 A. Correct.</p> <p>19 Q. And then no noted distractions, right?</p> <p>20 A. None noted.</p> <p>21 Q. And then 11/23 of '21, which is 2027. Sorry</p> <p>22 if I'm going fast. I just -- you know, trying to work</p> <p>23 our way through here.</p> <p>24 This is going to be 6-1/2 hours, correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 227</p> <p>1 A. I'm looking for it. 2037, 2036, 2035, there</p> <p>2 it is.</p> <p>3 Q. Okay. And I think this is from 8:00 a.m.</p> <p>4 to 2:30, right?</p> <p>5 A. Yes.</p> <p>6 Q. 6-1/2 hours, fair?</p> <p>7 A. Yes.</p> <p>8 Q. Listed as five sniffs, right?</p> <p>9 A. Yes.</p> <p>10 Q. I'll just say "listed as" so I'm not giving</p> <p>11 you heartburn because I understand your apprehension.</p> <p>12 A. Right.</p> <p>13 Q. Listed as no blanks, right?</p> <p>14 A. I don't see any.</p> <p>15 Q. No hemp or cash noted, right?</p> <p>16 A. Correct.</p> <p>17 Q. And then no distractions either, right?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. The next one, 11/9 of 2021, that's</p> <p>20 2033.</p> <p>21 A. Yes.</p> <p>22 Q. Okay. This one looks like it's from 8:00 a.m.</p> <p>23 to 2:30, so that's 6-1/2 hours, right?</p> <p>24 A. Yes.</p> <p>25 Q. It looks like there are four sniffs noted,</p>	<p style="text-align: right;">Page 229</p> <p>1 Q. And then I see nine sniffs noted; is that</p> <p>2 fair?</p> <p>3 A. Yes. Two blanks.</p> <p>4 Q. Right. So just to -- I was going to say that,</p> <p>5 but just before we get that there, nine snuffles noted,</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. And it looks like two blanks are noted, right?</p> <p>9 A. Yes.</p> <p>10 Q. And no cash or hemp noted, correct?</p> <p>11 A. Correct.</p> <p>12 Q. And then no distractions noted, right? Is</p> <p>13 that correct?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. 2025, which is on 11/30.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So that's going to be 8:00 a.m. to</p> <p>18 2:30, 6-1/2 hours, right?</p> <p>19 A. Yes.</p> <p>20 Q. Four sniffs noted, right?</p> <p>21 A. Yes.</p> <p>22 Q. No blanks noted, right?</p> <p>23 A. Correct.</p> <p>24 Q. No cash or hemp noted, right?</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 230</p> <p>1 Q. No distractions noted, right?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. January 1st of 2022 -- or 4th, I'm</p> <p>4 sorry, January 4th, 2022, which is Bates 2022, that's</p> <p>5 going to be six hours, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Yeah. Four sniffs noted, right?</p> <p>8 A. Correct.</p> <p>9 Q. Then no blanks noted, right?</p> <p>10 A. No.</p> <p>11 Q. No cash or hemp noted, right?</p> <p>12 A. Correct.</p> <p>13 Q. No distractions noted, right?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. January 18th of 2022, Bates 2020, it</p> <p>16 looks like there's six hours of training there, right?</p> <p>17 A. Yes.</p> <p>18 Q. Three sniffs noted, right?</p> <p>19 A. Yes.</p> <p>20 Q. No blanks noted, correct?</p> <p>21 A. Correct.</p> <p>22 Q. No cash or hemp noted, right?</p> <p>23 A. Correct.</p> <p>24 Q. And no distractions noted, right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. No blanks, right?</p> <p>2 A. No blanks.</p> <p>3 Q. No cash or hemp, right?</p> <p>4 A. Correct.</p> <p>5 Q. And then distractions are noted, right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. 2/15, which is at Bates 2011, and we're</p> <p>8 now in the month before the stop of Mr. Schott, right?</p> <p>9 A. Yes.</p> <p>10 Q. This is going to be six hours, right?</p> <p>11 A. Yes.</p> <p>12 Q. Four sniffs, right?</p> <p>13 A. Yes.</p> <p>14 Q. One blank; is that fair?</p> <p>15 A. Yes.</p> <p>16 Q. And no cash or hemp noted, right?</p> <p>17 A. None.</p> <p>18 Q. And then no distractions noted, right?</p> <p>19 A. I have a question.</p> <p>20 Q. Yeah, sure.</p> <p>21 A. It lists a bindle on the second search.</p> <p>22 Q. I was going to ask you what that was.</p> <p>23 A. And it sounds like they put a diversion or</p> <p>24 distraction in. A bindle is a -- are you aware of what</p> <p>25 a bindle is?</p>
<p style="text-align: right;">Page 231</p> <p>1 Q. Okay. 1/25 of 2022, which is on 2015.</p> <p>2 There's a handful more here.</p> <p>3 So that's going to be six hours, right?</p> <p>4 A. Yes.</p> <p>5 Q. This to me looks like there are 17 sniffs; is</p> <p>6 that fair?</p> <p>7 A. There's a bunch. Let me count.</p> <p>8 Q. Yeah, feel free.</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. 17 sniffs, I see one, two, three, four,</p> <p>11 five, six, seven, eight, nine, ten, 11, 12 blanks; is</p> <p>12 that fair?</p> <p>13 A. That's what I'm seeing.</p> <p>14 Q. Okay. No cash or hemp, right?</p> <p>15 A. Correct.</p> <p>16 Q. And then it looks like there are some</p> <p>17 distractions noted, right?</p> <p>18 A. There are.</p> <p>19 Q. Okay. We're at February 1st of 2022, which is</p> <p>20 at Bates 2013. That's -- sorry, go ahead.</p> <p>21 A. Okay.</p> <p>22 Q. That's going to be six hours, right?</p> <p>23 A. Yes.</p> <p>24 Q. Two sniffs, right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 233</p> <p>1 Q. No, please tell me.</p> <p>2 A. Okay. A bindle is usually a folded magazine</p> <p>3 or picture or something, which is used to hold narcotic</p> <p>4 and distribute narcotic. So it looks like they put a</p> <p>5 distractor in and didn't notice -- note anything, which</p> <p>6 is -- just shows that they -- these are not terribly</p> <p>7 detailed.</p> <p>8 Q. Okay. So for this 20 -- sorry, Bates 2011,</p> <p>9 which is on 2/15, your view is that a bindle is a</p> <p>10 distraction?</p> <p>11 A. If it had no narcotics, then it's a</p> <p>12 distraction.</p> <p>13 Q. Okay. But you don't know one way or the</p> <p>14 other?</p> <p>15 A. I -- they say it's a blank, so that would make</p> <p>16 me assume that there's no narcotic there if they are</p> <p>17 recording blanks.</p> <p>18 Q. So is it fair if I note that as a blank, but</p> <p>19 no distraction noted?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. On February 22nd, 2022, which is 2009,</p> <p>22 that's going to be six hours, right?</p> <p>23 A. Yes.</p> <p>24 Q. That's going to be four sniffs, right?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 234</p> <p>1 Q. That's going to be one blank again, right, the 2 bundle?</p> <p>3 A. Yes.</p> <p>4 Q. And then no cash or hemp noted, right?</p> <p>5 A. Correct.</p> <p>6 Q. And then no noted distractions, right?</p> <p>7 A. Correct.</p> <p>8 Q. And then the last one is going to be 9 March 15th of 2022, for narcotics trainings, at 10 Bates 2006. And this would be the day before the stop 11 in this case, right, March 15th?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And it looks like this was -- I keep 14 having to count on my fingers -- seven hours; is that 15 fair?</p> <p>16 A. Correct.</p> <p>17 Q. And only two sniffs, right?</p> <p>18 A. Correct.</p> <p>19 Q. No blanks?</p> <p>20 A. I don't see blanks, no.</p> <p>21 Q. And no cash or hemp noted, right?</p> <p>22 A. Correct.</p> <p>23 Q. And no distractions noted, right?</p> <p>24 A. Correct.</p> <p>25 Q. So let's just do a little bit of math.</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. And then I don't see any sales here that say 2 cash or hemp was ever used, right?</p> <p>3 A. Correct.</p> <p>4 Q. In the training site?</p> <p>5 A. No.</p> <p>6 Q. Okay. And then it looks like distractions 7 were noted in six of the 21 training sessions; is that 8 fair?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. All right. So I'm going to do a little 11 math here still. Over the course of ten months, there 12 are 123 hours of training. So if we do 123.5 divided 13 by ten -- I know the answer to this, but for the sake 14 of -- I can't even use this calculator -- that's going 15 to be 12.35, right?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So that's -- let me just write this 18 down somewhere. 12.35 per month, and then how many is 19 that going to be per week? 4.5 would be the divider 20 for that, right?</p> <p>21 A. Yes.</p> <p>22 Q. So 12.35 divided by 4.5, can you do that for 23 me? So that's 2.74 hours per week on narcotics 24 training for Deputy Molina in this ten-month period 25 for -- between the NCATS certification in '21 and the</p>
<p style="text-align: right;">Page 235</p> <p>1 MR. WINDHAM: Do you have your 2 calculator, Christen?</p> <p>3 MS. HEBERT: Oh, I always have my 4 calculator.</p> <p>5 Q. (BY MR. WINDHAM) This is not why I went to 6 law school, to do math, but we're going to do our best. 7 Okay. I'm going to hand you a calculator, sir.</p> <p>8 A. Oh, you can do it. I trust you to do it.</p> <p>9 Q. You do? Okay. So in that case -- and I 10 appreciate that and you just tell me if you have a 11 reason to dispute what I'm doing here. So I'm just 12 going to sum, let's see, B2 through B22, and it looks 13 like the total number of hours spent on training -- 14 sorry, it looks like the total number of hours recorded 15 for narcotics training for Deputy Molina in this 16 ten-month period would be 123.5 hours; is that fair?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Let's do the same thing for sniffs. It 19 looks like the total number of sniffs in this same 20 ten-month period during these narcotics training 21 sessions would have been 103; is that fair?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And the total number of blanks would 24 have been 18; is that fair?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 237</p> <p>1 stop of Alek Schott in 2022, right?</p> <p>2 A. That's what it looks like, yes.</p> <p>3 Q. And it looks like if you average out the 4 number of sniffs for those hours, let's do that math 5 here, how many sniffs is he going to be doing per hour 6 if you go 123.5 hours and 103 sniffs? It looks like 7 that's 0.83, so we're talking about less than a sniff 8 an hour during this period during training; is that 9 fair?</p> <p>10 A. Yeah.</p> <p>11 Q. Okay. And then in terms of blanks it looks 12 like -- what's 18 out of 103 in terms of a percentage? 13 I realize this is what's noted.</p> <p>14 So it looks like 17 percent of the noted 15 sniffs had a blank; is that fair?</p> <p>16 A. Yes.</p> <p>17 Q. That's all for numbers. So I just wanted to 18 ask you if you have any reaction to any of these 19 numbers.</p> <p>20 A. To the numbers, no. And part of it is -- is 21 that I have learned very little from this 22 recordkeeping.</p> <p>23 Q. Okay.</p> <p>24 A. And, again, I think I stated earlier that what 25 needs to happen is when we're talking about dog</p>

<p style="text-align: right;">Page 238</p> <p>1 training, there needs to be communication and a trainer  2 needs to be able to evaluate what's going on. This is  3 very, very simple, simplistic recordkeeping, and some  4 departments do it that way. I'm not going to say one  5 is right or wrong. I know some departments that the  6 only thing they keep up with is hours and that's it.  7 So I have a hard time looking at this and drawing any  8 real conclusions out of this.  9 Q. Okay. Do you have any -- I just want to be  10 clear for the record. So you said you draw very little  11 conclusions from these numbers?  12 A. Correct.  13 Q. Okay.  14 A. And now you know why I didn't do that.  15 Q. No, I understand.  16 In terms of -- in terms of this ten-month  17 period, an analysis of the training detail reports for  18 this ten-month period between Molina and  19 Max's 2021 NCATS certification and the stop of Alek  20 Schott in 2022, you did not perform this kind of  21 numerical analysis, right?  22 A. No.  23 Q. Okay. Let's shift gears a little bit. I'm  24 going to hand you another exhibit. All right. This is  25 going to be tab --</p>	<p style="text-align: right;">Page 240</p> <p>1 Q. Okay. Is it fair to say, just for the record,  2 that Exhibit 107 consists of the K9 deployment reports  3 by Deputy Molina from, let's see here, March 3rd  4 of 2021 through August 23rd of 2023?  5 A. I think I have one through October 2023.  6 Q. Oh, thank you. October 12th of 2023?  7 A. Correct.  8 Q. Okay. So we're March 3rd of 2021 through  9 October 12th of 2023?  10 A. Yes.  11 Q. Thank you.  12 Did you read or review any other K9  13 detail reports for Deputy Molina aside from the ones in  14 front of you?  15 A. I would have to look and see what I have in my  16 file, but this looks complete.  17 Q. Okay. All right. So I'm going to open up a  18 new Excel sheet here in front us. All right. So there  19 are a few forms here that I feel as -- there's a date  20 for each report, right? It looks like the report  21 indicates for every given K9 deployment whether there  22 was an alert.  23 Do you see that?  24 A. Yeah.  25 Q. And the --</p>
<p style="text-align: right;">Page 239</p> <p>1 A. I've got these all out of order, I think.  2 Q. That's okay. We can organize them by Bates  3 stamp.  4 MR. WINDHAM: This is going to be tab J,  5 and I think we're going to be using -- no, that's the  6 wrong one. Remember, it's from the big box. Oh, no, I  7 think that's right.  8 So I'm going to make this clear for the  9 record. There is a document here that was  10 previously -- part of a previously marked exhibit, but  11 this exhibit is a different exhibit consisting of  12 different material, so we're going to remark this.  13 (Exhibit 107 marked)  14 Q. (BY MR. WINDHAM) So we're handing you what's  15 been marked as Exhibit 107. All right. Take a gander  16 at this and let me know when you've had a chance to  17 look at it.  18 A. Okay.  19 Q. Okay. So I would like to do the same exercise  20 with these, and before I do that, just let me know,  21 have you seen these documents before?  22 A. Yeah, I believe I have seen these, yeah.  23 Q. Okay.  24 A. These are deployment reports versus his  25 training reports.</p>	<p style="text-align: right;">Page 241</p> <p>1 A. Utilizing the vocabulary --  2 Q. Exactly, yeah.  3 A. -- that Molina uses.  4 Q. That's a fair caveat. So we're going to use  5 Molina's vocabulary. And there are boxes where he says  6 "alert given, indication," that kind of thing, right?  7 A. Yes.  8 Q. Okay. They indicate in the activity finds  9 box, right, whether there were narcotics found. Is  10 that fair? You can flip through a few if you need to.  11 A. Okay, yes.  12 Q. Okay. And then there's a note for some of  13 them that say whether it's a trace amount or not.  14 Do you see that?  15 A. Yes.  16 Q. And then there's also a box for field test.  17 Do you see that?  18 A. Yes.  19 Q. Okay. And so there's also a box for approving  20 signature at the very bottom, right?  21 A. Yes.  22 Q. Okay. So let's go through some of these. I  23 want to start us on -- again, we're focused on that  24 ten-month period that we've been talking about, so I'm  25 going to go all the way to May 12th of 2021, which</p>

<p style="text-align: right;">Page 242</p> <p>1 would be after the NCATS certification; is that fair?</p> <p>2 A. Okay.</p> <p>3 Q. So maybe I just mean -- yeah, so it looks like</p> <p>4 the first May number is actually May 17th of 2021.</p> <p>5 Do I have that right? I just want to</p> <p>6 make sure that you and I are on the same page.</p> <p>7 A. The first May date?</p> <p>8 Q. Yep, in 2021.</p> <p>9 A. Is that where we're starting?</p> <p>10 Q. Yes, May 17th of 2021.</p> <p>11 A. So these first ones, I can move this out?</p> <p>12 Q. Correct, yes. So I'm on Bates --</p> <p>13 A. Bates 4837?</p> <p>14 Q. Correct.</p> <p>15 A. Okay.</p> <p>16 Q. Do you see -- you didn't see any earlier May</p> <p>17 dates, did you?</p> <p>18 A. No.</p> <p>19 Q. Okay. All right. So it looks like -- I'm</p> <p>20 just going to run through these in the same kind of</p> <p>21 way. Using Deputy Molina's lingo, it looks like an</p> <p>22 alert was noted, right?</p> <p>23 A. Yes.</p> <p>24 Q. An indication was noted, right?</p> <p>25 A. Yes. Again, for me this is confusing.</p>	<p style="text-align: right;">Page 244</p> <p>1 A. Because you're doing the same assumption that</p> <p>2 I'm trying not to.</p> <p>3 Q. Well, I haven't offered you any conclusions or</p> <p>4 anything.</p> <p>5 A. Well, but you're creating numbers and then</p> <p>6 from that you want to draw conclusions. And I don't</p> <p>7 know that we can do that here.</p> <p>8 Q. That's -- and if your -- if your perspective</p> <p>9 is that we can't look at these reports and draw</p> <p>10 conclusions --</p> <p>11 A. We can tell how much -- how many deployments</p> <p>12 and how many finds and that's about all we can come up</p> <p>13 with.</p> <p>14 Q. Okay. So I'm going to walk through and get</p> <p>15 some of these numbers, and then I understand you have</p> <p>16 your opinion about what we can draw from them.</p> <p>17 A. Yes.</p> <p>18 Q. I may have mine and we will go from there,</p> <p>19 right?</p> <p>20 A. Right.</p> <p>21 Q. Okay. So at least for 5/17 of 2021, it looks</p> <p>22 like an alert is noted, right?</p> <p>23 A. Yes.</p> <p>24 Q. Indication is noted?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 243</p> <p>1 Q. Sure.</p> <p>2 A. I'm not sure how he's using "alert" and</p> <p>3 "indication" these days.</p> <p>4 Q. Right.</p> <p>5 A. It seems like he uses it in terminology when</p> <p>6 he talks differently than what we have here. If this</p> <p>7 is my -- equivalent to my language, an alert followed</p> <p>8 by an indication, but I don't know that that's how he's</p> <p>9 using it here.</p> <p>10 Q. I understand. And I think --</p> <p>11 A. And, you know, of course I didn't talk to</p> <p>12 Molina --</p> <p>13 Q. Okay.</p> <p>14 A. -- about any of the --</p> <p>15 Q. You didn't talk to him at all before writing</p> <p>16 your report?</p> <p>17 A. No, at all.</p> <p>18 Q. Okay. Did you interview or talk to any Bexar</p> <p>19 County Sheriff's officers?</p> <p>20 A. No.</p> <p>21 Q. Okay. And I'm not going to ask you to divine</p> <p>22 what Molina had in his head. I'm just going to try to</p> <p>23 compile the numbers on the forms. Is that fair?</p> <p>24 A. It may not be.</p> <p>25 Q. Sure.</p>	<p style="text-align: right;">Page 245</p> <p>1 Q. Narcotics were found, right?</p> <p>2 A. Yes.</p> <p>3 Q. Trace amount, yes?</p> <p>4 A. That's what he noted.</p> <p>5 Q. There was no testing noted, right?</p> <p>6 A. Yeah, but --</p> <p>7 Q. And then there's no approving signature,</p> <p>8 right? Sorry, what did you say there?</p> <p>9 A. I just -- I'm getting the idea that you think</p> <p>10 that everything needs to be tested. And particularly</p> <p>11 when it comes to what we call shake, I have never seen</p> <p>12 anybody try to test shake.</p> <p>13 Q. Okay.</p> <p>14 A. And so I don't want to use that as a "Well, he</p> <p>15 didn't test it, so it didn't happen."</p> <p>16 Q. I'm just asking if testing was noted.</p> <p>17 A. That's the implied thing that you're doing</p> <p>18 here. It's implied.</p> <p>19 Q. But testing -- testing is not noted here,</p> <p>20 right?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay.</p> <p>23 A. But I don't want it to sound like there's an</p> <p>24 implication that that would -- that that's a failed</p> <p>25 search.</p>



<p style="text-align: right;">Page 246</p> <p>1 Q. Well, let me ask you a question about that.</p> <p>2 Is there any way of knowing whether shake is an illegal</p> <p>3 narcotic without testing it?</p> <p>4 A. Not that I'm aware of.</p> <p>5 Q. Okay.</p> <p>6 A. But we also don't know that, even if we find</p> <p>7 nothing, that there was an odor there because a dog</p> <p>8 doesn't know substance.</p> <p>9 Q. Sure.</p> <p>10 A. They have no idea about substance. They just</p> <p>11 work with their nose. And so I'm a little concerned</p> <p>12 about collecting numbers that cannot be substantiated</p> <p>13 one way or the other.</p> <p>14 Q. Uh-huh. And I understand your concern and</p> <p>15 it's on the record.</p> <p>16 A. Now you know why I didn't do that.</p> <p>17 Q. Okay. So I'm still going to run you through</p> <p>18 these because I would like to get the numbers.</p> <p>19 A. Okay.</p> <p>20 Q. But I understand your concern.</p> <p>21 So the approving signature, there is</p> <p>22 none, right?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. 5/19 of 2021 -- I'm sorry, that --</p> <p>25 A. That was 5/19.</p>	<p style="text-align: right;">Page 248</p> <p>1 the correct exhibit, so we can just send it to you so</p> <p>2 that you have it.</p> <p>3 THE REPORTER: Yeah.</p> <p>4 Q. (BY MR. WINDHAM) And we're going to go</p> <p>5 through that same exercise -- let me just make sure I</p> <p>6 can see this -- of getting some numbers down. And I'll</p> <p>7 show you the Excel sheet at the end so that I'm not</p> <p>8 like hiding it from you or anything. I just want to</p> <p>9 make sure we can all see the exhibit.</p> <p>10 MR. WINDHAM: Charles, if you need a copy</p> <p>11 of this, I'm happy to send it to you. All right. So</p> <p>12 I'm going to scroll through a little bit --</p> <p>13 THE REPORTER: What number are you going</p> <p>14 to mark it?</p> <p>15 MR. WINDHAM: We're going to mark this</p> <p>16 Exhibit 108.</p> <p>17 THE REPORTER: Okay.</p> <p>18 (Discussion off the record).</p> <p>19 (Exhibit 108 marked)</p> <p>20 Q. (BY MR. WINDHAM) So I'll represent to you,</p> <p>21 sir, that what I did here was just pull Deputy Molina's</p> <p>22 K9 detail reports for this ten-month period we've been</p> <p>23 talking about.</p> <p>24 A. Okay.</p> <p>25 Q. And this is starting at 5/12 of 2021, which is</p>
<p style="text-align: right;">Page 247</p> <p>1 Q. Yeah, that was 5/17 and now I'm on five --</p> <p>2 this is the wrong exhibit. Apologies. I have a very</p> <p>3 similar one to hand you, but this is not the right one.</p> <p>4 A. Okay.</p> <p>5 Q. And fortunately, we didn't get too far on this</p> <p>6 one,</p> <p>7 A. Good.</p> <p>8 Q. But it's the same exercise.</p> <p>9 A. Okay. So you want this back?</p> <p>10 Q. I would like it back. And we can strike that</p> <p>11 because it's not the correct exhibit.</p> <p>12 MR. BARRON: Is this another good</p> <p>13 opportunity for a break, then, while we --</p> <p>14 MR. WINDHAM: Yeah, let's do that. Let's</p> <p>15 do that.</p> <p>16 (Recess from 3:46 p.m. to 3:58 p.m.)</p> <p>17 Q. (BY MR. WINDHAM) We're back on the record,</p> <p>18 sir. Do you recognize you're still under oath?</p> <p>19 A. Yes.</p> <p>20 Q. Great. So we're going to try to get the</p> <p>21 exhibit right this time. I apologize for the</p> <p>22 confusion.</p> <p>23 MR. WINDHAM: Josh, would you label --</p> <p>24 actually, we're not doing that.</p> <p>25 I pulled it up on the screen. This is</p>	<p style="text-align: right;">Page 249</p> <p>1 the earliest I could find, going all the way to the</p> <p>2 March 16th, 2022 incident that this case is about.</p> <p>3 Do you see how I scrolled from top to</p> <p>4 bottom?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And this is 40 pages. I'm more than</p> <p>7 happy to scroll through this with you, if you want,</p> <p>8 just to confirm that these are all of those deployment</p> <p>9 reports. No need?</p> <p>10 A. I think -- no need.</p> <p>11 Q. Okay. So -- and you would have reviewed these</p> <p>12 in your preparation for this, right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. All right. So let's start at the very</p> <p>15 bottom because that's the earliest date. This is why I</p> <p>16 was confused about -- I thought there was a March 12th.</p> <p>17 There is a March 12th.</p> <p>18 So this is going to be Bates 4845 and</p> <p>19 we're just going to kind of pull these numbers. So it</p> <p>20 looks like here it's noted that there is -- the boxes</p> <p>21 say, "Alert, yes, indication, yes," right, but then</p> <p>22 overall, I see alert without indication.</p> <p>23 Do you see that?</p> <p>24 A. I see "alert given, yes," and "indication</p> <p>25 given, yes."</p>

<p style="text-align: right;">Page 250</p> <p>1 Q. Okay. And then above that it says, "Overall, 2 alert without an indication." 3 Do you see that? 4 A. Yeah. 5 Q. Okay. 6 A. There was a little bit of -- I'm not sure what 7 we've got going on there. 8 Q. Okay. And I -- honestly, I don't have a 9 strong preference for how we mark this. I just want to 10 mark what happened. 11 So my instinct, tell me if I'm wrong 12 about this, would be to mark the more detailed one 13 there. So it says "alert without indication" in 14 writing. My instinct is just to mark that's how the 15 report reads. 16 A. That's fine. 17 Q. Okay. So let's go alert, yes, indication, no. 18 Narcotics found, I don't see any in the training finds, 19 do you? 20 A. I'm not sure why there would be a training 21 find item there. 22 Q. Yeah, I'm not sure why it's -- 23 A. For me, this was -- this method of 24 recordkeeping is a little confusing. 25 Q. I understand. I'm just asking if you see any</p>	<p style="text-align: right;">Page 252</p> <p>1 amounts, right? 2 A. I don't see any traces. 3 Q. Okay. And then there's no approving signature 4 at the bottom, right? 5 A. Correct. 6 Q. Okay. And then testing, it looks like one of 7 them was tested, right, so we can put yes for that, 8 fair? 9 A. Yes. 10 Q. Okay. 5/26 of 2021 -- 11 A. So, actually -- 12 Q. Yes. 13 A. -- I need to back up to that one. 14 Q. The one before this? 15 A. Did it say they were sent to the lab? Is that 16 what that -- 17 Q. I see "field test, positive" and then I see 18 nothing in the lab column. 19 A. Okay. I'm just curious what that was all 20 about. 21 Q. And what we're trying to record here, just so 22 you know, is whether any test was performed. So to me, 23 it's just a yes. Is that fair? 24 A. Yes. 25 Q. Okay. And then the next one is going to be</p>
<p style="text-align: right;">Page 251</p> <p>1 narcotics found. 2 A. I don't see anything. 3 Q. Okay. So no narcotics found -- we will just 4 say that noted, it's none noted on the report. 5 A. Okay. 6 Q. And, therefore, you wouldn't have anything to 7 say for trace amount. And then in terms of testing, it 8 looks like there was no testing performed, right? Is 9 that fair? 10 A. Yes. 11 Q. And then no approving signature, right? 12 A. Correct. 13 Q. And then this is the one that we just did a 14 second ago when we were looking at the previous 15 exhibit, 5/17 of 2021. I'm happy to go through it 16 again and get -- get the figures or we can just move 17 along. 18 A. Just move along. 19 Q. Okay. The next one is going to be 5/19 20 of 2021, so it looks like an alert is noted, right? 21 A. Alert and indication. 22 Q. Okay, alert and indication are both noted. 23 Narcotics were found, right, in these activity finds? 24 A. Yes. 25 Q. And then none of them seem to be trace</p>	<p style="text-align: right;">Page 253</p> <p>1 5/26 of 2021, and it looks like an alert occurred, 2 right? 3 A. Yes. 4 Q. Or was noted, an indication was noted, right? 5 A. Yes. 6 Q. And then it looks like narcotics were found, 7 as noted on this report, right? 8 A. Yes. 9 Q. And it looks like it was a trace amount, 10 right? 11 A. Yes. 12 Q. And then no testing was performed, right? 13 A. Correct. 14 Q. And there was no approving signature, right? 15 A. Correct. 16 Q. Okay. The next one is going to be 5/28 17 of 2021, alert, yes, right? 18 A. Alert and -- and indication. 19 Q. Correct. And it looks like narcotics were 20 found, as noted, right? 21 A. Correct. 22 Q. And then it looks like they were both trace 23 amounts. Is that fair? 24 A. Yes. 25 Q. So that's just going to be a yes.</p>

<p style="text-align: right;">Page 254</p> <p>1 And then on testing, it looks like no 2 testing was performed, right? 3 A. Correct. 4 Q. And then no approving signature, fair? 5 A. Yes. 6 Q. And we're on 6/2 of 2021 now. The overall 7 here says, "Alert without indication," so is it fair to 8 mark it that way? 9 A. Yes. 10 Q. Okay. And it looks look narcotics were found, 11 fair? 12 A. Yes. 13 Q. And it notes that it was a trace amount, 14 right? 15 A. Yes. 16 Q. And no testing was performed, correct? 17 A. Correct. 18 Q. And no approving signature? 19 A. Correct. 20 Q. Okay. And then for 6/2 of 2021, I see "alert 21 without indication," right? 22 A. Correct. 23 Q. And narcotics were found, correct? 24 A. Correct. 25 Q. And I don't believe three ounces is a trace</p>	<p style="text-align: right;">Page 256</p> <p>1 Q. And no testing was performed, right? 2 A. No, it doesn't look like it. 3 Q. And then no approving signature, right? 4 A. Correct. 5 Q. And then we would say, because there are 6 measurable amounts here, that wouldn't be trace, right? 7 A. Correct. 8 Q. 6/11 of 2021, alert, yes, indication, yes, 9 right? 10 A. Correct. 11 Q. No narcotics found, right? 12 A. Correct. 13 Q. And then no testing or approving signature, 14 correct? 15 A. Correct. 16 Q. 6/21 of 2021, alert, yes, indication, yes, 17 right? 18 A. Yes. 19 Q. Narcotics were found, right? 20 A. Right. 21 Q. And unassigned, so two quantity of 22 unassigned -- kind of going back to what we talked 23 about a second ago -- 24 MR. FRIGERIO: He's off now. 25 MR. WINDHAM: Oh, okay. We will take a</p>
<p style="text-align: right;">Page 255</p> <p>1 amount, do you? 2 A. No. 3 Q. What would you call a trace amount, just 4 so I -- if it's not noted -- 5 A. Usually, what I would call a trace amount is 6 something that wasn't reasonable to try to do a field 7 presumptive test with. 8 Q. Okay. 9 A. That would -- that's the way I would look at 10 it. 11 Q. Okay. So if there's like a -- I don't know, 12 if there's a form that just doesn't list an amount of 13 weight, like it's -- there's no weight to that, that 14 would be a trace amount? 15 A. Yes. 16 Q. Okay. And then there's no approving signature 17 here, right? 18 A. Correct. 19 Q. And then no testing, correct? 20 A. Correct. 21 Q. All right. And then it looks like there was 22 an alert and indication here, right? 23 A. Yes. 24 Q. And narcotics were found, correct? 25 A. Yes.</p>	<p style="text-align: right;">Page 257</p> <p>1 pause. 2 MR. FRIGERIO: Are you back on, Steve? 3 MR. BARRON: Yes, sir. 4 MR. WINDHAM: Are we still on the record. 5 Okay, great. 6 Q. (BY MR. WINDHAM) So this "2.00, unassigned" 7 next to the narcotic find, how do you read that? 8 A. It doesn't have a unit, so I'm not sure how to 9 read that. 10 Q. Okay. Is it fair to call it trace if there's 11 no like weight amount? 12 A. I don't think we can say its trace or not 13 trace. 14 Q. So we just don't know. Is that fair? 15 A. It's just -- 16 Q. How about question mark? Is that fair? 17 A. Yeah. 18 Q. Question mark? 19 A. We don't know. 20 Q. All right. No testing, right? 21 A. Correct. 22 Q. And no approval of signature, right? 23 A. Correct. 24 Q. 6/23 of 2021, alert, yes, indication, yes, 25 right?</p>

<p style="text-align: right;">Page 258</p> <p>1 A. Yes.</p> <p>2 Q. Narcotics were found, correct?</p> <p>3 A. Correct.</p> <p>4 Q. And it was a trace amount, as noted on the</p> <p>5 report, right?</p> <p>6 A. Correct.</p> <p>7 Q. And then no testing or signature, correct?</p> <p>8 A. Correct.</p> <p>9 Q. 6/25 of 2021, alert, yes, indication, yes,</p> <p>10 right?</p> <p>11 A. Yes.</p> <p>12 Q. Narcotics found, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Not a trace amount, right?</p> <p>15 A. Correct.</p> <p>16 Q. And no testing or signature, right?</p> <p>17 A. Correct.</p> <p>18 Q. And when I say "signature," I'm talking about</p> <p>19 the approval signature.</p> <p>20 A. Yes.</p> <p>21 Q. 7/28 of 2021, alert, yes, indication, yes,</p> <p>22 right?</p> <p>23 A. Correct.</p> <p>24 Q. Narcotics were found, correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 260</p> <p>1 Q. All right. 9/6 of 2021, alert, yes,</p> <p>2 indication, yes, right?</p> <p>3 A. Yes.</p> <p>4 Q. Narcotics at a trace amount, right?</p> <p>5 A. Yes.</p> <p>6 Q. And then no testing or signature, correct?</p> <p>7 A. Yes.</p> <p>8 Q. 9/6 of 2021, I believe this is a different</p> <p>9 incident, yes. So we've got 9/6 that is Bates 4747 and</p> <p>10 we've got a 9/6 that is Bates 4748, just for the</p> <p>11 record. Is that fair?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So this is going to be alert, yes,</p> <p>14 indication, yes, right?</p> <p>15 A. Yes.</p> <p>16 Q. Narcotics, not a trace amount, right?</p> <p>17 A. Correct.</p> <p>18 Q. Field testing, yes, right?</p> <p>19 A. Yes.</p> <p>20 Q. And then no signature, right?</p> <p>21 A. Yes.</p> <p>22 Q. 9/21 of 2021 would be alert, yes, indication,</p> <p>23 yes, right?</p> <p>24 A. Yes.</p> <p>25 Q. I don't even know how to read this. Is your</p>
<p style="text-align: right;">Page 259</p> <p>1 Q. Not a trace amount, right?</p> <p>2 A. Correct.</p> <p>3 Q. And then no testing or approval signature,</p> <p>4 right?</p> <p>5 A. Correct.</p> <p>6 Q. 8/10 of 2021, alert, yes, indication, yes,</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. Narcotics were found, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Not a trace amount, right?</p> <p>12 A. Correct.</p> <p>13 Q. And then it looks like there was testing,</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And then no approval signature, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And then 9/1 of 2021, alert, yes, indication,</p> <p>19 yes, right?</p> <p>20 A. Yes.</p> <p>21 Q. And then it's going to be narcotics in a trace</p> <p>22 amount, right?</p> <p>23 A. Correct.</p> <p>24 Q. And then no testing or signature, correct?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 261</p> <p>1 view that if there's a 1.00, that means narcotics were</p> <p>2 found?</p> <p>3 A. I have no idea what it means.</p> <p>4 Q. You have no clue, okay. So let's put a</p> <p>5 question mark. Is that fair?</p> <p>6 A. Question mark on that one.</p> <p>7 Q. All right. And then a question mark on trace</p> <p>8 as well. And then no testing, right?</p> <p>9 A. Correct.</p> <p>10 Q. And then no approval signature, right?</p> <p>11 A. Correct.</p> <p>12 Q. Just as a matter of K9 detector -- or</p> <p>13 narcotics detection dog best practices, if illegal</p> <p>14 narcotics were found in a vehicle, what do officers</p> <p>15 generally do with those illegal narcotics?</p> <p>16 A. You find something that is chargeable.</p> <p>17 Generally, it is collected and put into evidence.</p> <p>18 Q. Okay.</p> <p>19 A. That's -- that's normally what I see.</p> <p>20 Q. Have -- I'm sorry, go ahead.</p> <p>21 A. So I don't know about the state of Texas.</p> <p>22 Where I'm -- where I was from, we did have some degree</p> <p>23 discretion in misdemeanors and it wasn't unusual for us</p> <p>24 to just say, "All right, you've got a misdemeanor</p> <p>25 amount, I'm not willing to go to court over a \$50</p>

<p style="text-align: right;">Page 262</p> <p>1 ticket."</p> <p>2 Q. Okay.</p> <p>3 A. "Dump it and you can go away."</p> <p>4 Q. So we really can't look at this and decide</p> <p>5 either way?</p> <p>6 A. Correct.</p> <p>7 Q. All right. For 9/29 of 2021, alert, yes,</p> <p>8 indication, yes, right?</p> <p>9 A. Correct.</p> <p>10 Q. No narcotics found, right?</p> <p>11 A. No.</p> <p>12 Q. And then no testing or approval signature,</p> <p>13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. And 10/14 of '21, alert, yes, indication, yes,</p> <p>16 right?</p> <p>17 A. Correct.</p> <p>18 Q. Trace amount of marijuana, right?</p> <p>19 A. Yes.</p> <p>20 Q. And then no testing or approval -- oh, wait,</p> <p>21 testing, yes, right? I'm sorry, no testing.</p> <p>22 A. No testing.</p> <p>23 Q. Sorry about that.</p> <p>24 And yes, approval signature?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 264</p> <p>1 Q. And then --</p> <p>2 A. Although above it, it says, "Alert with an</p> <p>3 indication." So it's alert with -- or without an</p> <p>4 indication.</p> <p>5 Q. That's what I see.</p> <p>6 A. But then he has alert with an indication, so</p> <p>7 I'm confused.</p> <p>8 Q. When we -- so am I. But when we did this with</p> <p>9 an earlier record, we marked it as the more specific</p> <p>10 text we would follow, so alert without indication is</p> <p>11 what we used. So I just want to make the record</p> <p>12 consistent.</p> <p>13 A. Yeah, I don't know what to make of it,</p> <p>14 frankly.</p> <p>15 Q. Okay. Do you have any objection to me putting</p> <p>16 alert, but no indication?</p> <p>17 A. No.</p> <p>18 Q. Okay. And then it looks like there is no</p> <p>19 narcotics found, at least as noted, correct?</p> <p>20 A. Correct.</p> <p>21 Q. Or testing, right?</p> <p>22 A. Correct.</p> <p>23 Q. But there is an approval signature. Is that</p> <p>24 fair?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 263</p> <p>1 Q. And that was by Rene Ochoa, right, it looks</p> <p>2 like?</p> <p>3 A. Yes, that one did get signed.</p> <p>4 Q. 10/24 of 2021, alert, yes, indication, yes,</p> <p>5 right?</p> <p>6 A. Yes.</p> <p>7 Q. Narcotics, yes?</p> <p>8 A. Yes.</p> <p>9 Q. And that is -- is a gram a trace amount?</p> <p>10 A. I would -- in my -- I wouldn't have done</p> <p>11 anything with a gram of marijuana in my career. How's</p> <p>12 that?</p> <p>13 Q. That's fine. So can we call it a trace --</p> <p>14 A. It's not worth -- it's not worth the drive to</p> <p>15 the courthouse.</p> <p>16 Q. If we mark it as trace, will that give you</p> <p>17 heartburn?</p> <p>18 A. Go ahead and mark it as trace.</p> <p>19 Q. Okay. And then no testing, right?</p> <p>20 A. Correct.</p> <p>21 Q. And then it was approval signed, right?</p> <p>22 A. Yes.</p> <p>23 Q. All right. 10/28 of 2021, using the "overall"</p> <p>24 box there, alert, yes, but indication, no, right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 265</p> <p>1 Q. 10/28 of 2021, it looks like there's no alert</p> <p>2 or indication, right?</p> <p>3 A. Correct.</p> <p>4 Q. And then no drugs found, no testing, right?</p> <p>5 A. Yeah, of course.</p> <p>6 Q. And then there was a signature, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. 11/10 of 2021, we're going to --</p> <p>9 applying our same method from last time of following</p> <p>10 the overall box, alert, yes, indication, no, right?</p> <p>11 A. Correct.</p> <p>12 Q. No drugs found, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And then no testing or signature, correct?</p> <p>15 A. Correct.</p> <p>16 Q. 11/16 of 2021, alert, yes, indication, yes,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. Four kilos of meth found, correct?</p> <p>20 A. Correct.</p> <p>21 Q. So that's going to be yes, narcotics and no,</p> <p>22 trace.</p> <p>23 No testing, right?</p> <p>24 A. Correct.</p> <p>25 Q. And then no signature, right?</p>

<p style="text-align: right;">Page 266</p> <p>1 A. Correct.</p> <p>2 Q. January 13th of 2022, alert, yes, indication,</p> <p>3 no, right?</p> <p>4 A. Correct.</p> <p>5 Q. No drugs found and, therefore, no trace,</p> <p>6 right?</p> <p>7 A. Correct.</p> <p>8 Q. And then no testing or approval signature,</p> <p>9 right?</p> <p>10 A. Correct.</p> <p>11 Q. 11/13 of 2022, alert, yes, indication, no,</p> <p>12 right?</p> <p>13 A. Correct.</p> <p>14 Q. Narcotics found, right?</p> <p>15 A. Correct.</p> <p>16 Q. No testing or signature, right?</p> <p>17 A. Correct.</p> <p>18 Q. And it's not a trace amount of narcotics,</p> <p>19 right?</p> <p>20 A. Right.</p> <p>21 Q. All right.</p> <p>22 A. No signature.</p> <p>23 (Discussion off the record)</p> <p>24 Q. (BY MR. WINDHAM) Okay. So let's just do this</p> <p>25 again since we're pretty quick about this. We're on</p>	<p style="text-align: right;">Page 268</p> <p>1 A. Correct.</p> <p>2 Q. Narcotics, yes, trace amount, correct?</p> <p>3 A. Correct.</p> <p>4 Q. And no testing or signature, correct?</p> <p>5 A. Correct.</p> <p>6 Q. 1/19 of 2022 is going to be alert, yes,</p> <p>7 indication, yes, correct?</p> <p>8 A. Correct.</p> <p>9 Q. It looks like narcotics were found, right?</p> <p>10 A. Yes.</p> <p>11 Q. And then would you call 1.1 grams trace or</p> <p>12 not?</p> <p>13 A. No.</p> <p>14 Q. Okay. And then field testing, yes, right?</p> <p>15 A. Yes.</p> <p>16 Q. And then approval signature, no, right?</p> <p>17 A. Correct.</p> <p>18 Q. We're getting there.</p> <p>19 1/27 of 2022, alert, yes, indication,</p> <p>20 yes, right?</p> <p>21 A. Correct.</p> <p>22 Q. Trace -- sorry, narcotics, yes, trace amount,</p> <p>23 yes, right?</p> <p>24 A. Correct.</p> <p>25 Q. No testing or signature, correct?</p>
<p style="text-align: right;">Page 267</p> <p>1 Bates 4684, we're on 11/16 of 2021 and this is the 231</p> <p>2 Noblewood Drive incident. Alert, yes, indication, yes,</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. Narcotics, yes, not a trace amount, right?</p> <p>6 A. Correct.</p> <p>7 Q. No testing, no signature, right?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. 1/13 of 2022 is going to be alert, yes,</p> <p>10 indication, no, right?</p> <p>11 A. Correct.</p> <p>12 Q. No drugs or signature, right?</p> <p>13 A. Correct.</p> <p>14 Q. Therefore, no testing or trace, right? Is</p> <p>15 that fair?</p> <p>16 A. Correct.</p> <p>17 Q. 1/13 of 2022, this is going to be alert, yes,</p> <p>18 indication, no, right?</p> <p>19 A. Correct.</p> <p>20 Q. Narcotics, yes, not a trace amount, right?</p> <p>21 A. Correct.</p> <p>22 Q. No testing or signature, correct?</p> <p>23 A. Correct.</p> <p>24 Q. 1/17 of 2022 is going to be alert, yes,</p> <p>25 indication, yes, correct?</p>	<p style="text-align: right;">Page 269</p> <p>1 A. Correct.</p> <p>2 Q. 1/27 of 2022, alert, yes, indication, yes,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. Trace amount of narcotics, correct?</p> <p>6 A. Correct.</p> <p>7 Q. No testing or signature, correct?</p> <p>8 A. Correct.</p> <p>9 Q. February 8th of 2022, alert, yes, indication,</p> <p>10 yes, correct?</p> <p>11 A. Correct.</p> <p>12 Q. Narcotics, not a trace amount, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And then no testing or signature, correct?</p> <p>15 A. Correct.</p> <p>16 Q. All right.</p> <p>17 A. Although I don't know what the units of a</p> <p>18 bundle is.</p> <p>19 Q. Same, but is -- I think I'm happy to agree</p> <p>20 with you that it's not a trace amount, right?</p> <p>21 A. Correct.</p> <p>22 Q. Okay.</p> <p>23 A. I mean, it's either a large -- a huge</p> <p>24 quantity, 35 kilos or 35 pounds or a misspelled bindle.</p> <p>25 Q. Okay. I mean, just -- I guess to be</p>

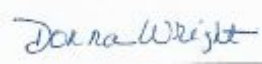


<p style="text-align: right;">Page 270</p> <p>1 comprehensive, if there were 35 units of bindle, what 2 would that mean? 3 A. Depending on how they cut their -- cut their 4 stuff into bindles. Usually that would be like a gram. 5 Q. Okay. But that wouldn't be a trace amount? 6 A. No. 7 Q. Okay. All right. So we're on February 10th 8 of 2022; alert, yes, indication, yes, right? 9 A. Yes. 10 Q. Narcotics found, not a trace amount, correct? 11 A. Correct. 12 Q. No testing or signature, correct? 13 A. Correct. 14 Q. February 17th of 2022, alert, yes, indication, 15 yes, correct? 16 Q. Marijuana found -- or narcotics found, right? 17 A. Correct. 18 Q. Not a -- or you tell me, is two grams a trace 19 amount? 20 A. No. 21 Q. Okay. And -- 22 A. Let me just qualify that. 23 Q. Sure. 24 A. I'm assuming that he's using one as an 25 under-a-gram small amount. I'm just guessing. That's</p>	<p style="text-align: right;">Page 272</p> <p>1 Q. Okay. 2 A. And they distribute -- they will sell half a 3 gram. That's not uncommon. 4 Q. So for this -- 5 A. I would call it -- for methamphetamine, I 6 would say that it's not a trace amount. 7 Q. Okay, got it. So no trace amount on this 8 February 24th record, correct? 9 A. Correct. 10 Q. And then no testing or signature, correct? 11 A. Correct. 12 Q. On February 28th of 2022, it looks like alert, 13 yes, indication, yes, correct? 14 A. Correct. 15 Q. And narcotics not in a trace amount, correct? 16 A. Correct. 17 Q. And -- 18 A. No field test. 19 Q. Yeah, no test or signature, correct? 20 A. Correct. 21 Q. Now you're leaving me. 22 March 3rd of 2022, alert, yes, 23 indication, yes, correct? 24 A. Correct. 25 Q. Trace amount of narcotics, correct?</p>
<p style="text-align: right;">Page 271</p> <p>1 what I assume. 2 Q. Same. 3 A. You know, that he found a bunch of shake and 4 he didn't go through and comb it all out of the carpet 5 or something. 6 Q. Yeah. So for this two grams, that's not a 7 trace amount? 8 A. No, I think that's a substantial difference. 9 Q. Okay. No testing or signature, correct? 10 A. Correct. 11 Q. And then 2/18 of 2022, alert, yes, indication, 12 yes, correct? 13 A. Yes. 14 Q. Trace amount of narcotics, correct? 15 A. Correct. 16 Q. No testing or signature, correct? 17 A. Correct. 18 Q. 2/24 of 2022, alert, yes, indication, yes, 19 correct? 20 A. Correct. 21 Q. Narcotics found, correct? 22 A. Correct. 23 Q. Do you consider 0.85 a trace amount? 24 A. Maybe if you measured it. It's so incomplete. 25 It's more than half a gram.</p>	<p style="text-align: right;">Page 273</p> <p>1 A. Correct. 2 Q. And then no tests or signature, correct? 3 A. Correct. 4 Q. And March 10th of 2022, alert, yes, 5 indication, yes, correct? 6 A. Correct. 7 Q. Narcotics in a trace amount, correct. 8 A. Correct. 9 Q. And then no testing or signature, correct? 10 A. Correct. 11 Q. And then March 16th of 2022, which is the 12 incident involved in this case, right? 13 A. Yes. 14 Q. Alert, yes, indication, yes, correct? 15 A. Correct. 16 Q. Trace amount of marijuana, correct? 17 A. Correct. 18 Q. And then no testing or signature, correct? 19 A. Correct. 20 Q. Okay, thank you. 21 MR. WINDHAM: All right. So what we're 22 going to do is plug this into your laptop; is that 23 cool? 24 MR. FOX: Yes. 25 MR. WINDHAM: And we're going to show you</p>

<p style="text-align: right;">Page 274</p> <p>1 the Excel sheet we produced. I see a blank row. Is 2 there a reason --</p> <p>3 MR. FOX: There was a 1/3 that was 4 supposed to be a 1/13, so I added 1/13 and just didn't 5 delete the 1/3.</p> <p>6 MR. WINDHAM: Okay. Let's delete that 7 row --</p> <p>8 MR. FOX: Yeah.</p> <p>9 MR. WINDHAM: -- that's a blank.</p> <p>10 Q. (BY MR. WINDHAM) All right. So I'm happy to 11 flip back to Exhibit 108, if we need to, so that you 12 can look at that again. I can hand you my laptop. But 13 what I really want to do is ask you whether you have 14 any reason to doubt the information up on the Excel 15 sheet in front of you, based on the exercise we just 16 did?</p> <p>17 A. No.</p> <p>18 Q. Okay.</p> <p>19 MR. WINDHAM: And let's do some math like 20 we did before, if you don't mind helping me out with 21 that, Josh. So scroll to the top for me.</p> <p>22 Q. (BY MR. WINDHAM) Okay. So it looks like 23 there were 40 deployments during this period; is that 24 fair?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 276</p> <p>1 A. Correct.</p> <p>2 Q. So out of the 40 deployments, he indicated 3 eight times, according to Deputy Molina's lingo; is 4 that fair?</p> <p>5 A. He failed to indicate eight times.</p> <p>6 Q. Thank you. He failed to indicate eight times.</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And then it looks like narcotics were 9 found, so let me make sure I have the math right 10 because I don't want this to be misleading. If he -- 11 going back to the alert column, if we register that 12 he -- Max alerted one time -- or failed to alert one 13 time, this number should actually be 39 instead of one, 14 correct?</p> <p>15 A. Correct. You put 30.</p> <p>16 Q. Oh, yeah. I'm at the end of my rope here. 17 Indication, so if we noted that Max failed to indicate 18 eight times, that means that out of 40 --</p> <p>19 A. 32.</p> <p>20 Q. -- 32 indications. Narcotics noted, let's see 21 how many times it was -- let's just do the number of 22 times it was noted. So we've got one, two, three, 23 four, five, six, seven, eight, nine, ten, 11, 12, 13, 24 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 25 28, 29, 30, 31, 32 times where narcotics were noted; is</p>
<p style="text-align: right;">Page 275</p> <p>1 Q. So 40 deployments, and it looks like he only 2 failed to alert one time. Is that fair?</p> <p>3 A. I'm not sure which column I'm looking at.</p> <p>4 Q. I'm sorry, that's my fault. It's going to be 5 this column right here, the alert column.</p> <p>6 A. Okay.</p> <p>7 Q. And I see one failure to alert. I don't see 8 any others, do you?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. So during the ten-month period that 11 we've been discussing and the 40 deployments of Max 12 during that period, he failed to alert only one time, 13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. Okay, put a one there. All right. Let do the 16 same for indications. So let's look at the indications 17 column. I see one, two, three, four, five -- whoops -- 18 six, seven, eight, nine. I see nine.</p> <p>19 MS. HEBERT: I think you should count 20 again.</p> <p>21 MR. WINDHAM: That's totally fair.</p> <p>22 Q. (BY MR. WINDHAM) One, two, three, four, five, 23 six, seven, eight. Okay, eight.</p> <p>24 A. Eight.</p> <p>25 Q. I have that right?</p>	<p style="text-align: right;">Page 277</p> <p>1 that fair?</p> <p>2 A. Correct.</p> <p>3 Q. How many of those were trace? Let's count it. 4 I see one, two, three, four -- one, two, three, four -- 5 we don't know, with a question mark -- five, six, 6 seven, eight -- we don't know -- nine, ten, 11, 12, 13. 7 14, 15, 16; is that fair, 16 incidents where trace 8 amounts were noted?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And then in terms of testing, I'm 11 trying to think of how to do this. It looks like there 12 was one, two, three, four instances where Deputy Molina 13 tested the drugs; is that fair, four times?</p> <p>14 A. Okay, I don't know that Molina tested or 15 somebody else tested.</p> <p>16 Q. That's fair. Where testing was noted on the 17 reports. Is that fair?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. And then it looks like there were -- I 20 think there's just this -- okay, so there were four 21 approving signatures of the 40 deployments; is that 22 fair?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay.</p> <p>25 A. So this is a ten-month period?</p>

<p style="text-align: right;">Page 278</p> <p>1 Q. Correct.</p> <p>2 A. Okay.</p> <p>3 Q. Okay. And so I just wanted to ask, we went</p> <p>4 through Deputy Molina's K9 training reports earlier --</p> <p>5 A. Correct.</p> <p>6 Q. -- and now we have just gone through some of</p> <p>7 his deployment reports, right?</p> <p>8 A. Correct.</p> <p>9 Q. Do you have the same -- you expressed some</p> <p>10 hesitation about relying on his training reports</p> <p>11 earlier. Do you have the same apprehension about these</p> <p>12 or do you feel differently?</p> <p>13 A. I think there are some things that are a</p> <p>14 little bit incomplete, but also I don't know their</p> <p>15 policies and the way they conduct business. But, you</p> <p>16 know, this at least tells us a little bit more, but</p> <p>17 while at the same time a little bit less.</p> <p>18 So training, you know, you're trying --</p> <p>19 trying to do diversions and distractions, just trying</p> <p>20 to improve your dog all the time. So, you know, in</p> <p>21 a -- in a deployment thing, you're usually not talking</p> <p>22 about those things unless it had a significant effect</p> <p>23 on what you're doing.</p> <p>24 Q. Okay.</p> <p>25 A. So I don't -- don't expect those to be there.</p>	<p style="text-align: right;">Page 280</p> <p>1 say?</p> <p>2 A. They say what the forms say, but it's</p> <p>3 relatively vague information.</p> <p>4 Q. Understood. Thank you.</p> <p>5 Okay. I just want to back up to the very</p> <p>6 beginning of our discussion when I asked you a few</p> <p>7 questions about the report itself. So my question --</p> <p>8 A. Okay.</p> <p>9 Q. Yeah, so back to your report. If you want to</p> <p>10 pull that out, you're welcome to.</p> <p>11 A. I do.</p> <p>12 Q. That's going to be Exhibit 105, I believe.</p> <p>13 A. Okay.</p> <p>14 Q. So I think I have this from earlier, but tell</p> <p>15 me if I'm getting this right. The expertise that</p> <p>16 you're bringing to bear in this case is about K9</p> <p>17 handling and K9 handling practices, right?</p> <p>18 A. And experience doing the deployment.</p> <p>19 Q. Sure. K9 deployments, though?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Do you claim to be an expert in</p> <p>22 criminal interdiction practices?</p> <p>23 A. No.</p> <p>24 Q. Okay. So you don't intend to offer any</p> <p>25 opinions in this case about criminal interdiction</p>
<p style="text-align: right;">Page 279</p> <p>1 So, you know, this is -- this is, you know, probably</p> <p>2 not too unusual for people's deployment -- deployment</p> <p>3 reports. I can tell you what I did. I never made</p> <p>4 these.</p> <p>5 Q. You never made these?</p> <p>6 A. No.</p> <p>7 Q. That's fair.</p> <p>8 A. All I did was write a uniform incident report.</p> <p>9 That's it. My training and deployment notes were the</p> <p>10 same thing. If I deployed, I circled "deploy" and I</p> <p>11 wrote the CAD number or the case number --</p> <p>12 Q. Okay.</p> <p>13 A. -- and the location. That was it because</p> <p>14 that's really where the information is at on this.</p> <p>15 MR. WINDHAM: What I would like to do is</p> <p>16 introduce these Excel sheets as Exhibit -- I think</p> <p>17 we're on 109, aren't we -- as Exhibit 109. We will</p> <p>18 send them to you because I don't have a way of handing</p> <p>19 you the Excel sheets.</p> <p>20 (Exhibit 109 marked)</p> <p>21 Q. (BY MR. WINDHAM) But, Mr. Sheldahl, just to</p> <p>22 confirm it, we just went through this whole exercise of</p> <p>23 logging the report data in the Excel sheets. At least</p> <p>24 as the Excel sheets reflect our discussion, do you have</p> <p>25 any reason to doubt that they reflect what the forms</p>	<p style="text-align: right;">Page 281</p> <p>1 practices?</p> <p>2 A. Correct.</p> <p>3 Q. Do you claim to be an expert in traffic stops?</p> <p>4 A. I think every deputy and officer is an expert</p> <p>5 in traffic stops. We do them consistently, constantly.</p> <p>6 Q. Do you claim to have any training, experience</p> <p>7 and expertise above and beyond the trainings,</p> <p>8 experience and expertise that an average law</p> <p>9 enforcement officer has?</p> <p>10 A. In respect to narcotics, I did participate in</p> <p>11 numerous courses, Desert Snow, which is -- I did twice</p> <p>12 during my career. There was -- I did a course on</p> <p>13 commercial vehicles at one point in my career and</p> <p>14 another one on consensual encounters, which we often</p> <p>15 try to turn traffic stops into consensual encounters</p> <p>16 while trying to investigate.</p> <p>17 Q. Okay. My question is really do you intend to</p> <p>18 offer expert testimony in this case about traffic stop</p> <p>19 practices?</p> <p>20 A. I was asked to look at the K9 portion of this</p> <p>21 case.</p> <p>22 Q. Okay. Do you -- would you feel comfortable</p> <p>23 offering expert testimony in this case about traffic</p> <p>24 stops?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 282</p> <p>1 Q. And then in terms of the information on which 2 you relied in producing this report, we went through 3 some of the documents earlier, right, we discussed some 4 of those? 5 A. Yes. 6 Q. And you said the sum total of them would be in 7 a Dropbox folder that you received? 8 A. Yes. 9 Q. Okay. So if I wanted to see the sum total of 10 them, I would have to see that Dropbox folder? 11 A. Yes. 12 Q. Okay. As you sit here today, do you have any 13 intention of supplementing your report? 14 A. At this point, no, but I haven't reviewed my 15 deposition either. 16 Q. Okay. So it's possible that, based on your 17 deposition, you might want to revise your report? 18 A. Sure. 19 Q. Okay. Tell me how you would go about deciding 20 whether to do that. 21 A. I have to read it first to even have an idea. 22 Q. Well, have you ever revised a deposition or an 23 expert report prior to this? 24 A. I have not revised one prior to this. 25 Q. Okay. What kind of information, if you saw it</p>	<p style="text-align: right;">Page 284</p> <p>1 Mr. Frigerio for all of the information you felt you 2 needed to draw informed opinions about this case? 3 A. I just utilized what I was provided. 4 Q. I'm sorry? 5 A. I just utilized the information I was 6 provided. 7 Q. Understood. And you felt comfortable drawing 8 the opinions in your report based on that information? 9 A. Yes. 10 Q. Okay. And my question is do you feel that 11 you've had the opportunity -- all of the opportunity 12 you need to obtain all of the information that would be 13 necessary to write this report? 14 A. I guess I have to make the assumption that I 15 have received everything. 16 Q. Okay. 17 A. I can only make that assumption. 18 Q. My question is just -- I'm not asking what you 19 discussed with Mr. Frigerio, necessarily. My question 20 is did you have an opportunity to ask him for 21 additional documents if you wanted them? 22 A. Yes. 23 Q. Okay. All right. Let's take a quick break. 24 I think I'm close to the end. 25 (Recess from 4:35 p.m. to 4:41 p.m.)</p>
<p style="text-align: right;">Page 283</p> <p>1 in a deposition transcript, would give you a reason to 2 revise your opinions? 3 A. I don't know. I would have to read the 4 transcript. 5 Q. Okay. So you just don't know one way or the 6 other? 7 A. I just want to leave that open in case I see 8 something and go, "Oh, you know, that's something I 9 need to note." 10 Q. Okay. Do you feel that during this 11 deposition, you learned any new factual information 12 that would justify supplementing or amending the 13 opinions in your report? 14 A. I'm not sure. 15 Q. Okay. Is that the sort of thing you would 16 assess when deciding whether to amend your report? 17 A. Yes. 18 Q. Okay. Did you learn anything today as a 19 matter of fact from any of the exhibits that would 20 cause you to question the conclusions in your report? 21 A. No. 22 Q. Did you learn anything today that would cause 23 you to feel stronger about the opinions in your report? 24 A. No. 25 Q. Okay. Have you had an opportunity to ask</p>	<p style="text-align: right;">Page 285</p> <p>1 Q. (BY MR. WINDHAM) We're back from the break. 2 Do you recognize you're still under oath? 3 A. Yes. 4 Q. All right. 5 A. That's going to be all of my questions for 6 you. I just want to note for the record that under the 7 Federal Rules of Civil Procedure, we are entitled to 8 the disclosure of the records you reviewed, so the 9 Dropbox folder that you mentioned and, therefore, we're 10 going to hold this open for future deposition in the 11 event that there's anything in the Dropbox folder that 12 bears on your testimony or we haven't seen before. 13 A. Okay. 14 Q. Okay. 15 MR. WINDHAM: I think that's everything 16 for me. 17 THE REPORTER: Okay. 18 MR. FRIGERIO: We will reserve our 19 questions. 20 MR. BARRON: I'll reserve as well. 21 MR. WINDHAM: Off the record. 22 (Proceedings concluded at 4:42 p.m.) 23 24 25</p>

<p style="text-align: right;">Page 286</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: KEVIN SHELDAHL</p> <p>3 DATE OF DEPOSITION: JANUARY 9, 2025</p> <p>4 PAGE LINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>	<p style="text-align: right;">Page 288</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 WESTERN DISTRICT OF TEXAS</p> <p>3 SAN ANTONIO DIVISION</p> <p>4 ALEK SCHOTT, )</p> <p>5 Plaintiff, )</p> <p>6 )</p> <p>7 v. ) Civil Action No.</p> <p>8 ) 5:23-cv-00706-OLG-RBF</p> <p>9 JOEL BABB, in his individual )</p> <p>10 and official capacity; )</p> <p>11 MARTIN A. MOLINA III, in his )</p> <p>12 individual and official )</p> <p>13 capacity; JAVIER SALAZAR, )</p> <p>14 in his individual and )</p> <p>15 official capacity; and BEXAR )</p> <p>16 COUNTY, TEXAS, )</p> <p>17 Defendants. )</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 287</p> <p>1 I, KEVIN SHELDAHL, have read the foregoing</p> <p>2 deposition and hereby affix my signature that same is</p> <p>3 true and correct, except as noted above.</p> <p>4 _____</p> <p>5 KEVIN SHELDAHL</p> <p>6</p> <p>7 THE STATE OF _____ )</p> <p>8 COUNTY OF _____ )</p> <p>9 Before me, _____, on this day personally</p> <p>10 appeared KEVIN SHELDAHL, known to me (or proved to</p> <p>11 me under oath or through _____) (description</p> <p>12 of identity card or other document) to be the</p> <p>13 person whose name is subscribed to the foregoing</p> <p>14 instrument and acknowledged to me that he executed</p> <p>15 the same for the purposes and consideration therein</p> <p>16 expressed.</p> <p>17 Given under my hand and seal of office, this</p> <p>18 _____ day of _____, _____.</p> <p>19</p> <p>20</p> <p>21 NOTARY PUBLIC IN AND FOR</p> <p>22 THE STATE OF _____</p> <p>23 My commission expires: _____</p> <p>24 _____ No Changes Made _____ Amendment Sheet(s) Attached</p> <p>25</p>	<p style="text-align: right;">Page 289</p> <p>1 I further certify that pursuant to FRCP Rule</p> <p>2 30(3) that the signature of the deponent:</p> <p>3 ___X___ was requested by the deponent or a party</p> <p>4 before the completion of the deposition and that the</p> <p>5 signature is to be before any notary public and</p> <p>6 returned within 30 days from date of receipt of the</p> <p>7 transcript. If returned, the attached Changes and</p> <p>8 Signature Page contains any changes and the reasons</p> <p>9 therefore:</p> <p>10 _____ was not requested by the deponent or a</p> <p>11 party before the completion of the deposition.</p> <p>12 I further certify that I am neither counsel</p> <p>13 for, related to, nor employed by any of the parties or</p> <p>14 attorneys in the action in which this proceeding was</p> <p>15 taken, and further that I am not financially or</p> <p>16 otherwise interested in the outcome of the action.</p> <p>17 Certified to by me on this, the 10 day of</p> <p>18 January, 2025.</p> <p>19</p> <p>20 </p> <p>21</p> <p>22 DONNA WRIGHT, Texas CSR 1971</p> <p>23 Expiration Date: 11/30/26</p> <p>24 VERITEXT LEGAL SOLUTIONS</p> <p>25 300 Throckmorton Street</p> <p>Ft. Worth, Texas 76102</p> <p>Firm Registration No. 571</p>

Page 290

1 COUNTY OF TRAVIS )  
 2 STATE OF TEXAS )  
 3 I hereby certify that the witness was notified  
 4 on January that th 20th the witness has 30 days or  
 5 (\_\_\_\_\_ days per agreement of counsel) after being  
 6 notified by the officer that the transcript is  
 7 available for review by the witness and if there are  
 8 changes in the form or substance to be made, then the  
 9 witness shall sign a statement reciting such changes  
 10 and the reasons given by the witness for making them;  
 11 That the witness' signature was/was not returned as  
 12 of \_\_\_\_\_.  
 13 Subscribed and sworn to on this, the \_\_\_\_\_ day  
 14 of \_\_\_\_\_, 2025.  
 15  
 16  
 17

VERITEXT LEGAL SOLUTIONS  
 300 Throckmorton Street  
 Ft. Worth, Texas 76102  
 Firm Registration No. 571

Page 291

1 Charles Frigerio, Esquire  
 2 csfrigeriolaw@sbcglobal.net  
 3 January 20, 2025  
 4 RE: Schott, Alek v. Babb, Joel Et Al  
 5 1/9/2025, Kevin Sheldahl (#7035859)  
 6 The above-referenced transcript is available for  
 7 review.  
 8 Within the applicable timeframe, the witness should  
 9 read the testimony to verify its accuracy. If there are  
 10 any changes, the witness should note those with the  
 11 reason, on the attached Errata Sheet.  
 12 The witness should sign the Acknowledgment of  
 13 Deponent and Errata and return to the deposing attorney.  
 14 Copies should be sent to all counsel, and to Veritext at  
 15 cs-midatlantic@veritext.com  
 16 Return completed errata within 30 days from  
 17 receipt of testimony.  
 18 If the witness fails to do so within the time  
 19 allotted, the transcript may be used as if signed.  
 20  
 21  
 22  
 23  
 24  
 25

Yours,  
 Veritext Legal Solutions

74 (Pages 290 - 291)



[&amp; - 1st]

Page 1

<b>&amp;</b>	<b>10/21</b> 223:3	<b>11/10</b> 265:8	<b>15th</b> 234:9,11
<b>&amp;</b> 2:15	<b>10/24</b> 263:4	<b>11/13</b> 266:11	<b>16</b> 21:20,23
<b>0</b>	<b>10/28</b> 263:23	<b>11/16</b> 228:9	23:1 26:1,7
<b>0.83</b> 237:7	265:1	265:16 267:1	30:20 276:24
<b>0.85</b> 271:23	<b>10/5</b> 217:23	<b>11/2</b> 226:21	277:7,7
<b>00706</b> 1:5	<b>100</b> 40:16,20,21	<b>11/23</b> 228:21	<b>16th</b> 18:2
288:5	62:2 64:2	<b>11/30</b> 229:15	205:22 206:2
<b>1</b>	162:14,20	<b>11/30/26</b>	249:2 273:11
<b>1</b> 16:6 32:15,17	164:7,9 165:9	289:22	<b>17</b> 231:5,10
32:22 33:14	165:11,17	<b>11/9</b> 227:19	237:14 276:24
150:4,6 162:10	166:14 193:5	<b>111</b> 1:22 2:22	<b>177</b> 3:22
166:24 167:1	<b>103</b> 235:21	<b>11:01</b> 70:10	<b>17th</b> 242:4,10
<b>1.00</b> 261:1	237:6,12	<b>11:49</b> 114:13	270:14
<b>1.1</b> 268:11	<b>105</b> 3:11 14:25	<b>12</b> 29:7 231:11	<b>18</b> 156:16,19
<b>1.3</b> 46:16	15:2,11 16:2	276:23 277:6	235:24 237:12
<b>1/13</b> 267:9,17	72:2 280:12	<b>12.35</b> 236:15,18	276:24
274:4,4	<b>106</b> 3:12 143:3	236:22	<b>1800s</b> 53:9
<b>1/17</b> 267:24	143:14,16	<b>123</b> 236:12	<b>18th</b> 230:15
<b>1/19</b> 268:6	<b>107</b> 3:13	<b>123.5</b> 235:16	<b>19</b> 15:21,22
<b>1/25</b> 231:1	204:15,20	236:12 237:6	276:24
<b>1/27</b> 268:19	239:13,15	<b>12:14</b> 134:20	<b>1900s</b> 53:9
269:2	240:2	<b>12:30</b> 114:10	<b>19082</b> 289:20
<b>1/3</b> 274:3,5	<b>108</b> 3:14	<b>12th</b> 208:10	<b>1971</b> 289:22
<b>1/9/2025</b> 291:5	248:16,19	240:6,9 241:25	<b>1992</b> 34:13
<b>10</b> 72:4,4 73:1	274:11	249:16,17	<b>1:00</b> 223:5
172:25 173:2	<b>109</b> 3:15	<b>13</b> 29:7,18	<b>1:21</b> 134:21
289:17	279:17,17,20	276:23 277:6	<b>1:40</b> 187:13,14
<b>10/12</b> 219:12	<b>10:48</b> 70:10	<b>13th</b> 266:2	187:16
<b>10/13</b> 220:4	<b>10th</b> 270:7	<b>14</b> 276:24	<b>1:46</b> 179:13,15
<b>10/14</b> 262:15	273:4	277:7	179:17 181:14
<b>10/19</b> 222:13	<b>11</b> 72:4 73:4	<b>143</b> 3:12	181:16
	150:4,6 162:10	<b>15</b> 3:11 26:1	<b>1st</b> 230:3
	231:11 276:23	30:18 276:24	231:19
	277:6	277:7	

[2 - 2:00]

Page 2

<b>2</b>	<b>2019</b> 78:18	268:6,19 269:2	<b>20th</b> 290:4
<b>2</b> 3:2 21:20	95:2,5	269:9 270:8,14	<b>21</b> 205:10
24:7 26:7	<b>2020</b> 230:15	271:11,18	226:21 228:21
31:24 32:15,17	<b>2021</b> 95:10	272:12,22	236:7,25
32:22 33:14	124:15 206:2	273:4,11	262:15 276:24
34:8,9 36:14	206:17 207:19	<b>2023</b> 124:16,17	<b>210</b> 2:23
36:19,20,21	207:22 208:8,9	240:4,5,6,9	<b>22</b> 33:20 37:10
70:8 72:3	208:13 209:14	<b>2024</b> 11:3,14	205:11 276:24
146:8 156:19	212:18,25	124:9	<b>22203</b> 2:5
172:23	213:13 219:12	<b>2025</b> 1:14,19	<b>22nd</b> 233:21
<b>2.00</b> 257:6	220:5 227:19	229:15 286:3	<b>23</b> 124:9 144:9
<b>2.74</b> 236:23	228:9 238:19	288:12 289:18	205:10 276:24
<b>2/15</b> 232:7	240:4,8 241:25	290:14 291:3	<b>231</b> 267:1
233:9	242:4,8,10	<b>2027</b> 228:21	<b>239</b> 3:13
<b>2/18</b> 271:11	244:21 246:24	<b>2029</b> 228:9	<b>23rd</b> 240:4
<b>2/24</b> 271:18	248:25 251:15	<b>2033</b> 227:20	<b>24</b> 276:24
<b>20</b> 9:22,24 10:3	251:20 252:10	<b>2035</b> 226:22	<b>248</b> 3:14
10:5 69:16	253:1,17 254:6	227:1	<b>24th</b> 272:8
70:3 129:1	254:20 256:8	<b>2036</b> 227:1	<b>25</b> 276:24
233:8 276:24	256:16 257:24	<b>2037</b> 227:1	<b>26</b> 3:20 204:18
291:3	258:9,21 259:6	<b>2038</b> 223:3	205:2 276:24
<b>200</b> 2:16	259:18 260:1,8	<b>204</b> 3:20	<b>27</b> 276:24
<b>200-9697</b> 2:17	260:22 262:7	<b>2041</b> 222:13	<b>271-7877</b> 2:23
<b>2002</b> 11:5	263:4,23 265:1	<b>2043</b> 220:25	<b>279</b> 3:15
12:10	265:8,16 267:1	<b>2045</b> 219:13	<b>27th</b> 208:11
<b>2006</b> 234:10	<b>2022</b> 18:2	<b>2047</b> 217:24	212:18,25
<b>2009</b> 233:21	205:23 206:2	<b>2049</b> 216:3,15	213:13
<b>2011</b> 232:7	206:17 207:19	<b>2053</b> 214:17	<b>28</b> 276:25
233:8	230:3,4,4,15	216:4,5	<b>286</b> 3:6
<b>2013</b> 231:20	231:1,19	<b>2055</b> 214:19	<b>288</b> 3:7
<b>2014</b> 34:13	233:21 234:9	<b>2058</b> 213:1,4	<b>28th</b> 272:12
<b>2015</b> 231:1	237:1 238:20	<b>206</b> 3:21	<b>29</b> 276:25
	249:2 266:2,11	<b>2070</b> 207:23	<b>2:00</b> 216:18
	267:9,17,24	208:1	

**[2:28 - 76102]**

Page 3

<b>2:28</b> 190:16 <b>2:30</b> 209:7 213:15 215:1 218:2 219:15 227:4,23 229:18 <b>2:32</b> 188:22 190:20 <b>2:33</b> 189:25 190:2,3,6,16,23 191:1,25 193:11 <b>2:34</b> 189:1 192:12 193:11 <b>2:36</b> 189:1 <b>2:40</b> 199:3 <b>2:48</b> 199:3	291:16 <b>300</b> 143:10 289:23 290:18 <b>31</b> 276:25 <b>32</b> 3:22 178:1 276:19,20,25 <b>330</b> 115:23 <b>340</b> 115:23 <b>35</b> 269:24,24 270:1 <b>350</b> 205:7,12 <b>352</b> 205:15 <b>360</b> 138:11 <b>39</b> 276:13 <b>3:35</b> 194:7 196:12 <b>3:46</b> 247:16 <b>3:58</b> 247:16 <b>3rd</b> 240:3,8 272:22	<b>4684</b> 267:1 <b>4700</b> 2:15 <b>4747</b> 260:9 <b>4748</b> 260:10 <b>480-5936</b> 2:11 <b>4837</b> 242:13 <b>4845</b> 249:18 <b>4:31</b> 196:20,24 197:7 <b>4:35</b> 284:25 <b>4:38</b> 197:10 <b>4:41</b> 284:25 <b>4:42</b> 1:19 285:22 <b>4th</b> 207:22 208:8,13 209:13 230:3,4	<b>50</b> 261:25 <b>512</b> 2:11,17 <b>571</b> 289:24 290:19 <b>5:23</b> 1:5 288:5 <b>5th</b> 208:13
<b>3</b>		<b>5</b>	<b>6</b>
<b>3</b> 21:19 24:12 32:5 36:15,21 40:14 289:2 <b>3.90</b> 46:16 60:16 <b>3.999.</b> 46:13 <b>3/16/22</b> 3:15 <b>30</b> 3:21 9:18 10:5 13:8 39:14 63:5,9 111:18 114:15 122:13 206:11 209:9 223:9 276:15,25 289:2,6 290:4	<b>4</b>	<b>5</b> 18:7 21:3,19 25:24 26:8 32:7 156:20 172:25 173:3 <b>5-1/2</b> 216:18,21 <b>5/12</b> 248:25 <b>5/12/21</b> 3:15 <b>5/17</b> 244:21 247:1 251:15 <b>5/19</b> 246:24,25 251:19 <b>5/26</b> 252:10 253:1 <b>5/28</b> 253:16	<b>6</b> 19:25 26:10 27:6 29:16,17 <b>6-1/2</b> 218:3 219:16 222:14 227:6,23 228:10,24 229:18 <b>6.5</b> 209:13 <b>6/11</b> 256:8 <b>6/2</b> 254:6,20 <b>6/21</b> 256:16 <b>6/23</b> 257:24 <b>6/25</b> 258:9 <b>60</b> 38:9 70:6 <b>682-9320</b> 2:6
			<b>7</b>
			<b>7</b> 146:5,23 <b>7/28</b> 258:21 <b>70</b> 63:2,7,12 64:5 65:2 <b>703</b> 2:6 <b>7035859</b> 291:5 <b>70s</b> 123:6 <b>76102</b> 289:24 290:18

[78205 - adept]

Page 4

<b>78205</b> 2:23	<b>900</b> 2:5	122:7 181:11	171:4
<b>78701</b> 2:11	<b>901</b> 2:4	183:22	<b>activity</b> 241:8
<b>78723</b> 2:16	<b>90s</b> 11:6,8 13:1	<b>academy</b> 39:8	251:23
<b>8</b>	65:8 201:23,25	39:16	<b>actual</b> 10:9
<b>8</b> 28:7	<b>91</b> 202:8	<b>accident</b> 11:7	139:15
<b>8/10</b> 259:6	<b>96</b> 123:5,7	11:10 13:11	<b>actually</b> 14:19
<b>8/17</b> 214:23	<b>970</b> 2:10	<b>accomplish</b>	15:6 17:24
216:6	<b>98</b> 123:5	184:1	19:22 29:7
<b>8/17/2021</b>	<b>9:30</b> 223:6	<b>accuracy</b> 291:9	36:18 70:5
214:12	<b>9:32</b> 1:19	<b>accurate</b>	79:8 87:5
<b>80</b> 202:7,20	<b>a</b>	143:23 146:17	91:10,20 95:3
204:4	<b>a.m.</b> 1:19 70:10	212:12	99:21 106:18
<b>80s</b> 201:23,25	70:10 209:6	<b>achieved</b> 44:11	117:25 148:5,6
<b>816</b> 2:10	213:14 218:2	<b>achievement</b>	148:9 157:13
<b>840</b> 2:22	219:15 227:3	205:8	173:8 175:20
<b>89</b> 202:8	227:22 229:17	<b>achieving</b>	197:5 198:8
<b>8:00</b> 209:6	<b>ability</b> 19:9	205:9	206:18 222:24
218:2 219:15	46:5,6 48:14	<b>acknowledged</b>	225:5 226:12
227:3,22	113:10	287:13	242:4 247:24
229:17	<b>able</b> 53:10	<b>acknowledg...</b>	252:11 276:13
<b>8th</b> 269:9	87:10 138:3,4	291:12	<b>adapt</b> 172:20
<b>9</b>	173:13 191:23	<b>acquired</b> 84:19	<b>add</b> 85:5
<b>9</b> 1:14,19 18:7	200:4 225:13	<b>acronyms</b>	144:18 168:17
286:3 288:12	226:13 238:2	44:16 101:1	216:5
<b>9/1</b> 259:18	<b>above</b> 1:18	<b>action</b> 1:4	<b>added</b> 144:16
<b>9/21</b> 216:2,14	22:4 101:15	288:4 289:14	144:17 274:4
260:22	129:1,1 250:1	289:16	<b>addition</b>
<b>9/29</b> 262:7	264:2 281:7	<b>actionable</b>	167:24
<b>9/6</b> 260:1,8,9	287:3 291:6	139:9	<b>additional</b>
260:10	<b>absent</b> 199:18	<b>actions</b> 8:23	284:21
<b>90</b> 62:3 123:4	<b>absolutely</b> 17:3	20:1 138:4	<b>address</b> 5:13
202:2,19,20	48:7 49:12	<b>activation</b> 11:6	128:12
204:4	88:13 96:8	<b>actively</b> 120:6	<b>adept</b> 224:7
		137:22 169:22	

[adopted - amount]

Page 5

<b>adopted</b> 24:10	<b>albuquerque</b>	254:7,20	104:11 139:10
<b>advanced</b> 37:1	12:15 125:12	255:22 256:8	<b>allowance</b>
<b>advertising</b>	125:13,21	256:16 257:24	88:21
144:14	<b>alek</b> 1:3 4:8	258:9,21 259:6	<b>allowed</b> 148:10
<b>affairs</b> 27:19	18:3 237:1	259:18 260:1	<b>allowing</b>
27:25 28:3	238:19 288:3	260:13,22	184:13
<b>affix</b> 287:2	291:4	262:7,15 263:4	<b>altogether</b>
<b>agency</b> 98:23	<b>alert</b> 49:5,11,24	263:24 264:2,3	183:8
<b>ago</b> 4:7 121:21	51:11 55:6,15	264:6,10,16	<b>amazing</b> 53:10
122:1,8,24	55:24 57:5	265:1,10,16	53:14,22,25
123:7 125:1	63:20 66:12	266:2,11 267:2	75:24 113:10
170:16 203:10	76:3 79:16	267:9,17,24	172:19
203:10 251:14	80:3,21 82:22	268:6,19 269:2	<b>amazingly</b>
256:23	90:2 91:25	269:9 270:8,14	224:7
<b>agree</b> 4:22 96:1	96:24 97:21	271:11,18	<b>amend</b> 283:16
96:10 144:3	98:7 129:13	272:12,22	<b>amending</b>
208:22 216:7	132:1,11,23	273:4,14 275:2	283:12
218:12 219:11	133:2,5,9,12,14	275:5,7,12	<b>amendment</b>
269:19	140:22 141:3,4	276:11,12	287:24
<b>agreement</b>	151:5 162:12	<b>alerted</b> 151:16	<b>amount</b> 32:13
103:6 290:5	165:20 166:8	165:6 175:15	125:14 193:25
<b>ahead</b> 28:23	172:9 175:8	199:24 276:12	197:2 198:9
135:19 217:10	182:3 193:13	<b>alerting</b> 69:15	241:13 245:3
226:25 231:20	195:14 199:18	89:6 90:18	251:7 253:9
261:20 263:18	199:21 200:3,4	91:7,20 92:3	254:13 255:1,3
<b>aided</b> 24:16	200:9,13,14,17	93:16,24 95:19	255:5,12,14
<b>aids</b> 104:20	200:20 201:6	98:6	257:11 258:4
223:24	211:2 240:22	<b>alerts</b> 79:12,15	258:14 259:1
<b>aimed</b> 136:22	241:6 242:22	126:2 130:14	259:11,22
<b>ain't</b> 125:21	243:2,7 244:22	153:1	260:4,16
192:18	249:21,22,24	<b>alive</b> 84:24	261:25 262:18
<b>air</b> 98:10	250:2,13,17	<b>allotted</b> 291:19	263:9 266:18
<b>al</b> 13:3 291:4	251:20,21,22	<b>allow</b> 51:20	267:5,20 268:2
	253:1,17,18	59:12 103:24	268:22 269:5

[amount - artificially]

Page 6

269:12,20 270:5,10,19,25 271:7,14,23 272:6,7,15,25 273:7,16 <b>amounts</b> 198:6 252:1 253:23 256:6 277:8 <b>analogous</b> 80:24 81:7 <b>analysis</b> 198:12 238:17,21 <b>animal</b> 53:13 217:5,11,18 <b>animals</b> 149:1 <b>annual</b> 101:24 102:2 <b>anomaly</b> 141:22 <b>answer</b> 6:3 7:1 19:17 34:6 69:10 71:5 97:10,16 98:2 102:19 103:2 104:5 115:19 115:19 116:14 143:25 144:23 144:25 166:22 197:22 236:13 <b>answering</b> 6:13 6:17 <b>answers</b> 6:6 97:8 131:8,9	<b>anticipate</b> 159:8 163:15 <b>anticipating</b> 189:13 <b>anticipation</b> 189:13 <b>antonio</b> 1:2,23 2:23 288:2 <b>anybody</b> 7:25 138:2 147:6 157:2 245:12 <b>anyway</b> 77:15 <b>apologies</b> 247:2 <b>apologize</b> 143:6 207:3 247:21 <b>apparent</b> 44:7 45:16 <b>apparently</b> 165:3 <b>appear</b> 82:20 83:17 <b>appearances</b> 3:2 <b>appeared</b> 20:22 28:21 287:9 <b>appears</b> 83:9 144:5 <b>applicable</b> 140:6 291:8 <b>application</b> 94:15 95:25 168:5 <b>apply</b> 41:23 47:17 55:23	169:15,17,19 <b>applying</b> 41:18 265:9 <b>appointed</b> 116:19 <b>appreciate</b> 15:9 216:11 235:10 <b>apprehension</b> 11:5 12:11 227:11 278:11 <b>approach</b> 41:2 63:19 65:17 112:24 148:14 162:16,17 <b>approaches</b> 148:12,15 163:16 <b>approaching</b> 196:13,17 <b>appropriate</b> 148:15 166:8 170:7 183:22 183:24 <b>appropriately</b> 74:23 <b>approval</b> 257:22 258:19 259:3,16 261:10 262:12 262:20,24 263:21 264:23 266:8 268:16 <b>approve</b> 153:6	<b>approving</b> 241:19 245:7 246:21 251:11 252:3 253:14 254:4,18 255:16 256:3 256:13 277:21 <b>approximation</b> 10:2 <b>april</b> 208:11 <b>area</b> 39:14 48:25 49:1,4 77:6 92:1 93:13 96:13 97:7,9 111:17 116:9 125:12 145:15 157:4 175:16 200:8 211:19 218:21 218:25 219:3 223:25 224:1 <b>areas</b> 48:13 75:16 224:10 <b>arenas</b> 75:22 <b>arlington</b> 2:5 <b>armed</b> 12:14 <b>arrest</b> 125:4,23 <b>arrested</b> 126:3 <b>arrive</b> 112:25 <b>arrived</b> 31:4 <b>artful</b> 80:9 <b>article</b> 75:19 <b>artificially</b> 158:22
---	--	---	--



[aside - back]

Page 7

<b>aside</b> 19:6,11 21:14 31:20 33:13 38:13 128:24 165:17 240:13 <b>asked</b> 8:4,9,10 8:19 11:22 54:10 70:15 71:4 75:8 77:22 280:6 281:20 <b>askew</b> 141:17 <b>asking</b> 45:3 52:9,10 56:13 64:8 65:7 71:9 74:13 80:8 105:14 114:23 115:7 116:12 145:6 158:18 160:24 161:11 163:20 171:21 176:20 212:23 221:14,14 222:4 245:16 250:25 284:18 <b>asks</b> 179:17 <b>assess</b> 23:7 44:1 62:12 119:22 283:16 <b>assessed</b> 45:8 46:6 <b>assessing</b> 41:16 44:4 70:16 71:13 122:5	<b>assessment</b> 40:4,23 44:20 <b>assessments</b> 71:22 <b>assigned</b> 55:7 60:22 61:12 62:3 66:11 76:3 77:2,6 82:23 85:3,14 85:16,22 89:1 89:7 123:2 153:17 189:14 210:1 211:10 224:5 226:19 <b>assignment</b> 8:13,25 221:4 <b>associate</b> 83:7 <b>associated</b> 55:8 149:21 <b>association</b> 39:5 <b>assume</b> 8:10 13:11 22:6 23:12 34:15 37:24 38:13 40:20 41:17 44:13 74:19 76:6,25 77:1 84:3 92:24 96:6 97:21 101:24 110:1 193:15 210:1 233:16 271:1	<b>assumed</b> 55:16 <b>assuming</b> 210:5 270:24 <b>assumption</b> 196:9 198:13 219:1 244:1 284:14,17 <b>astute</b> 133:4 <b>attached</b> 1:25 23:24 33:10 287:24 289:7 291:11 <b>attaches</b> 151:12 <b>attempt</b> 167:25 201:5 <b>attempting</b> 40:21 60:22 168:7 169:12 <b>attend</b> 186:19 187:10 <b>attending</b> 186:20 187:5,9 <b>attention</b> 22:20 184:15 186:23 <b>attorney</b> 4:13 291:13 <b>attorneys</b> 4:14 289:14 <b>audience</b> 53:19 53:20 <b>audit</b> 25:6 <b>auditing</b> 135:9 <b>august</b> 240:4	<b>austin</b> 2:11,16 <b>authentic</b> 144:4 <b>author</b> 144:12 <b>authority</b> 100:12 <b>available</b> 59:2 290:7 291:6 <b>avenue</b> 2:10 <b>average</b> 40:6 105:24 107:22 237:3 281:8 <b>avoid</b> 171:22 <b>aware</b> 59:17 198:2 206:21 232:24 246:4 <b>awful</b> 204:3
			<b>b</b>
			<b>b</b> 37:18 120:1 <b>b2</b> 235:12 <b>b22</b> 235:12 <b>babb</b> 1:5 2:14 19:24 20:1,8 20:20,24 26:14 27:11 28:1 30:18,22 196:12,21 288:5 291:4 <b>babb's</b> 4:13 <b>back</b> 5:18 11:7 25:12 29:12 35:10,14 40:17 49:3 54:15 60:13 65:10,25

[back - behavior]

Page 8

66:8 68:4	<b>backseat</b>	284:8	111:20 121:12
70:11 74:9	164:15	<b>basic</b> 18:6	178:23 179:13
79:7,9 83:22	<b>bad</b> 102:11	38:16 66:6	280:6
91:4,17 95:3	121:3 139:19	75:10 97:18	<b>begins</b> 55:3
100:24 115:13	139:20 148:14	134:13 144:3	83:7 87:16
120:18 127:10	<b>bag</b> 164:20	173:5 225:7,10	151:5
128:15 130:17	<b>bail</b> 164:14	<b>basically</b> 88:2	<b>behave</b> 112:12
134:22 137:5	<b>ball</b> 57:19	113:12 134:8	<b>behaved</b> 176:2
139:18 151:9	111:22 154:14	139:18 141:9	<b>behaves</b> 112:16
153:3 162:6,10	157:14,18,18	144:16 145:10	<b>behavior</b> 45:9
162:24 163:6	157:20 180:13	154:18 170:19	46:4 48:14
170:23 171:2	197:13	195:7 206:20	49:25 51:12
173:14,19,22	<b>ballistic</b> 58:4	<b>basics</b> 74:20	54:14 55:8
174:4 181:22	<b>ballpark</b>	81:23	57:7,8 58:4
182:7,24 183:2	124:20	<b>basis</b> 19:15	66:12 67:10,10
183:11,20,21	<b>ballparked</b>	47:1 136:24	79:16,24 80:3
185:9,19,22	123:25	<b>bates</b> 207:23,25	80:10,24,25
186:23 187:1,7	<b>barking</b> 82:15	213:1 214:12	81:9,18 82:5,9
187:8,24,25	<b>barks</b> 182:1	214:17 216:3	82:10,17 83:11
188:9 190:11	<b>barron</b> 2:14	230:4,15	84:23 88:23
191:14,15	4:13 6:25 15:5	231:20 232:7	89:13,14,15,17
197:7 199:2,4	15:9 114:2,4	233:8 234:10	89:21 90:3
200:16 203:4	114:16 214:14	239:2 242:12	91:5 99:18
206:18 214:1	247:12 257:3	242:13 249:18	103:21 111:5
216:14 247:9	285:20	260:9,10 267:1	122:23 128:4
247:10,17	<b>base</b> 126:15	<b>bathroom</b> 7:6	132:1,3 133:13
252:13 256:22	<b>based</b> 10:13	<b>bear</b> 35:19	133:14 147:19
257:2 274:11	18:22 19:2,5	280:16	147:22 148:14
276:11 280:5,9	19:12 21:5	<b>bears</b> 285:12	148:25 149:4
285:1	42:1 45:6,8	<b>becoming</b>	149:18,25
<b>background</b>	73:24 84:15	59:13 142:22	151:16 159:23
81:12 118:5	202:24 204:5	<b>bedbugs</b> 75:18	160:4,7,13
144:24	218:19 225:6	<b>beginning</b>	162:21 166:1
	274:15 282:16	100:14 109:7	167:21 180:9

## [behavior - blanks]

Page 9

181:10 188:18 198:17 <b>behaviorists</b> 53:14 <b>behaviors</b> 81:5 81:6 82:10 86:14 99:5,6 100:2 111:7 148:7 150:13 161:2 166:4 172:17 <b>beings</b> 107:7 <b>belief</b> 77:14 <b>believe</b> 28:18 30:13,16 32:2 53:15 64:15 70:9 78:5 93:4 93:6 99:2 142:9 155:15 205:18 212:18 215:22 216:2 217:24 226:22 239:22 254:25 260:8 280:12 <b>believes</b> 83:24 185:13 <b>belt</b> 180:14 <b>belts</b> 171:12 <b>benefit</b> 186:20 <b>benefits</b> 107:12 <b>bernalillo</b> 34:10,11,12 37:14,17 42:3 43:18	<b>best</b> 36:7 40:7 41:19 43:5 54:3 92:25 93:1,4,6 94:23 95:17 106:7 115:4 116:9,9 118:10 138:18 163:21 183:15 235:6 261:13 <b>better</b> 41:10,11 41:12 42:24 48:8 51:6 64:13 65:11,16 71:2 96:21 99:13 101:17 101:17,17 125:21 155:22 157:1 181:3 199:16 <b>bettered</b> 71:14 <b>betterment</b> 42:21 71:10,13 <b>bexar</b> 1:8 2:19 24:7,10,12,19 29:1 115:1,22 142:8 145:18 145:23 243:18 288:8 <b>beyond</b> 10:3 117:21 281:7 <b>big</b> 16:24 51:2 62:21 66:3 75:13 106:23 115:22 117:21	139:16,22 141:9,11,24 186:20 187:18 239:6 <b>bigger</b> 142:12 <b>biggest</b> 140:12 <b>bill</b> 78:16 95:3 95:16 <b>bills</b> 92:12 <b>bindle</b> 232:21 232:24,25 233:2,9 234:2 269:24 270:1 <b>bindles</b> 270:4 <b>biological</b> 75:21 <b>bird</b> 80:25 81:1 109:17,19 <b>bit</b> 11:13,25 15:21 21:11 26:19 32:12 33:17 36:15 39:13 46:22 63:23 75:11 90:15 92:15 100:25 106:5 107:2 114:21 134:15 136:15 139:4 150:19 152:13 155:14 163:4 164:10 167:12 174:16 185:22 188:12 197:6,8 201:20	234:25 238:23 248:12 250:6 278:14,16,17 <b>bite</b> 10:25 11:14 87:17 <b>bites</b> 87:18 <b>biting</b> 82:17 <b>black</b> 40:23,24 <b>blame</b> 185:17 <b>blank</b> 68:21 207:8 210:17 211:23 213:21 213:24 214:3,4 218:8,16,17,18 219:4,12,24 220:25 221:25 222:6,7,7,8 232:14 233:15 233:18 234:1 237:15 274:1,9 <b>blanket</b> 77:14 <b>blanks</b> 69:4 207:10 215:7 216:24 219:20 219:23 220:17 222:19,21 223:13 225:21 225:23 227:13 228:3,15 229:3 229:8,22 230:9 230:20 231:11 232:1,2 233:17 234:19,20 235:23 237:11
---	---	--	---

[blasted - camera]

Page 10

<b>blasted</b> 188:6	<b>bound</b> 138:8	<b>bring</b> 47:9	<b>cad</b> 24:23
<b>blind</b> 104:15,17	<b>bounds</b> 138:7	132:7 163:6	279:11
106:11 176:7	<b>box</b> 137:19	183:20	<b>calculation</b>
176:16 177:14	209:13 239:6	<b>bringing</b>	124:21
<b>blood</b> 75:19	241:9,16,19	280:16	<b>calculator</b>
<b>blowing</b> 182:17	263:24 265:10	<b>brings</b> 187:1	235:2,4,7
200:6	<b>boxes</b> 136:1	<b>broad</b> 24:20	236:14
<b>body</b> 30:17,19	139:8 140:3	<b>broadly</b> 9:5	<b>calendar</b> 53:11
30:20 111:12	148:6 209:18	<b>brought</b> 20:12	<b>call</b> 5:9 60:23
125:3,6,9,15	211:22 241:5	186:23	60:24 76:14
126:6,9,16	249:20	<b>brunn</b> 46:1	112:10 127:17
128:2,6,19	<b>boy</b> 143:9	<b>buds</b> 97:1	129:15,16
131:3 132:9	176:18 177:4	<b>build</b> 59:13	131:17 132:23
133:20 138:4	177:12	159:14	150:10 151:2
167:25 169:12	<b>bracket</b> 214:2	<b>building</b> 107:7	181:7 189:7
178:12	218:24	167:16 188:16	191:17 192:24
<b>bogus</b> 92:10	<b>bracketed</b>	<b>buildings</b> 25:13	210:6,7,10,22
<b>bomb</b> 85:24	218:21	140:7	211:5 245:11
175:19,21	<b>bracketing</b>	<b>built</b> 225:21	255:3,5 257:10
188:15	60:25	<b>bunch</b> 132:9	263:13 268:11
<b>bombs</b> 75:15	<b>brand</b> 57:24	133:20 173:12	272:5
<b>border</b> 139:16	94:12	201:22 225:21	<b>called</b> 26:21
<b>botanist</b> 78:22	<b>break</b> 7:5 21:11	231:7 271:3	53:1 78:13
<b>botany</b> 79:4	46:22 50:14	<b>bundle</b> 269:18	<b>calls</b> 27:22
<b>bottom</b> 19:25	114:6,15 174:4	<b>business</b> 11:16	132:23
21:3,19 207:13	189:20 199:2,9	11:17 26:16	<b>cam</b> 125:3,6,9
207:24 216:10	201:13 247:13	278:15	125:15 126:6,9
241:20 249:4	284:23 285:1	<b>busy</b> 137:9	126:17 128:2
249:15 252:4	<b>breathing</b>	166:2	128:20 131:3
<b>boulevard</b> 2:15	177:11	<b>butt</b> 160:11	132:9 133:20
<b>bounce</b> 157:14	<b>brief</b> 10:23	<b>c</b>	178:12
<b>bouncing</b>	13:4 35:15	<b>c</b> 2:1	<b>camera</b> 30:17
157:17	133:3		30:19,20,23
			128:6 138:11

**[camera - certification]**

Page 11

189:9 <b>cancers</b> 75:23 <b>capacities</b> 39:9 <b>capacity</b> 1:6,7 1:8 11:11,14 12:20 38:19 42:10 288:6,7 288:8 <b>capstone</b> 31:22 <b>captain</b> 115:20 <b>car</b> 56:6 59:11 60:4 63:3 66:11,13 100:22 101:23 101:24 102:2,3 102:4,7,11 112:22 113:3 113:12,16,24 126:2,2 131:6 132:21 133:22 133:24 162:3 164:19 171:5 179:18,19,20 180:1 181:19 181:21 182:21 183:4 184:21 187:5,17 193:13 194:15 194:17,24 196:1,25 197:4 197:19,23 198:9 200:23 221:4,6	<b>card</b> 287:11 <b>cardinal</b> 150:10,11,15 162:6 164:3 <b>care</b> 149:6 179:2 186:17 186:18 <b>career</b> 26:24 28:20 32:25 36:24 38:18 40:2 54:11,13 90:21 145:15 263:11 281:12 281:13 <b>carpet</b> 271:4 <b>carroll</b> 195:21 195:23,25 <b>carry</b> 171:8,9 <b>cars</b> 62:2 66:24 68:23,25 69:8 93:23 129:25 130:1,3 140:4 140:5,6 182:17 184:22 220:25 221:5 <b>carving</b> 41:9,11 <b>cascade</b> 61:2 <b>case</b> 7:17 8:4 8:20 13:23 18:11 29:8 32:24 54:23 71:20,22 107:20 112:21 126:1 145:22	147:10 149:24 149:24 165:4 181:7 203:13 206:23 234:11 235:9 249:2 273:12 279:11 280:16,25 281:18,21,23 283:7 284:2 <b>cases</b> 10:24 14:9,12,14,16 14:19,20 125:23 <b>cash</b> 92:6,6,7 92:21 93:8,11 93:23,24 211:1 211:16,18 214:5 215:9 217:1 218:11 219:25 220:20 222:22 223:15 227:15 228:5 228:17 229:10 229:24 230:11 230:22 231:14 232:3,16 234:4 234:21 236:2 <b>cast</b> 64:22 183:2 191:14 192:18,22 <b>casted</b> 187:25 <b>casting</b> 183:21 186:4,6,7,10,11 186:22 187:1	188:9,18 <b>casts</b> 187:8 <b>cat</b> 217:11,15 217:16 <b>catalyst</b> 20:11 <b>catch</b> 27:17 86:22 136:12 <b>categories</b> 76:1 140:13 <b>category</b> 32:4 75:13 217:12 <b>cause</b> 1:18 16:12 30:1 44:8 48:20 98:17 195:18 283:20,22 <b>causes</b> 132:17 <b>caveat</b> 23:1 241:4 <b>ceiling</b> 51:8 <b>certain</b> 75:22 78:9 <b>certainly</b> 43:11 62:6 85:7 93:2 <b>certificate</b> 3:7 205:7,8 288:23 <b>certification</b> 25:16 38:25 39:2 65:13 68:11 70:2 100:25 101:1,7 101:9,16 103:22 104:7 121:25 141:12
---	--	---	---

**[certification - coach]**

Page 12

141:20 206:1,6 236:25 238:19 242:1 288:11 <b>certifications</b> 69:2 101:12 205:13 <b>certified</b> 39:11 68:19 101:5 102:14 103:7 118:13,14 288:14 289:17 <b>certify</b> 65:1 288:16 289:1 289:12 290:3 <b>certifying</b> 39:6 68:22 <b>chain</b> 139:19 <b>chance</b> 137:8 239:16 <b>change</b> 17:4,12 30:1 47:18 57:6,7,8 79:24 80:3 132:23 133:2,5,12,14 151:16 177:11 199:17 286:4 <b>changed</b> 143:1 <b>changes</b> 16:23 58:4 286:1 287:24 289:7,8 290:8,9 291:10 <b>changing</b> 54:14 84:15	<b>characteristics</b> 87:13 <b>characterize</b> 182:5 <b>charge</b> 141:10 226:17 <b>chargeable</b> 129:14 261:16 <b>charles</b> 1:22 2:20,21 4:14 16:7 35:8 221:23 248:10 288:22 291:1 <b>charlie</b> 2:21 4:15 <b>chart</b> 121:1,2 122:13 <b>charts</b> 10:17 122:8,9,10,11 122:22,23 123:12,12 <b>chase</b> 86:19,25 182:20,22 <b>chasing</b> 184:5 185:13 <b>chebert</b> 2:6,12 <b>check</b> 135:25 174:7 202:17 <b>checking</b> 137:18 139:8 140:3 <b>checkmarks</b> 202:14	<b>checks</b> 174:6 <b>cheerleader</b> 56:1 <b>chimpanzee</b> 186:16 <b>chocolate</b> 91:4 <b>choose</b> 81:17 82:3 <b>chooses</b> 80:13 <b>christen</b> 2:9 4:12 235:2 <b>christopher</b> 16:14 <b>chunk</b> 187:18 <b>cigarettes</b> 106:4 <b>circle</b> 49:3 79:7 <b>circled</b> 279:10 <b>circles</b> 106:4 <b>circulated</b> 92:6 92:7 <b>citizen</b> 38:19 <b>city</b> 125:12 <b>civil</b> 1:4,24 285:7 288:4 <b>claim</b> 280:21 281:3,6 <b>claims</b> 198:8 <b>clarification</b> 114:5 <b>clarify</b> 16:5,20 17:21 19:21 <b>clarifying</b> 162:8	<b>class</b> 86:2 118:18 145:7 <b>classes</b> 11:23 41:5 <b>classically</b> 133:9 <b>clean</b> 67:19 88:21 130:3 171:23,23,25 172:3,4 197:10 <b>clear</b> 6:6 20:6 55:1 104:6 106:6 111:16 149:24 179:8 208:4 238:10 239:8 <b>clearly</b> 6:6 <b>clever</b> 53:1,8 53:17,18,20 177:14 <b>clicked</b> 23:20 <b>clicking</b> 24:5 <b>clip</b> 181:13 186:1 <b>clips</b> 189:21 <b>close</b> 38:10 55:9 90:6 165:11 194:25 284:24 <b>cloud</b> 122:13 <b>clue</b> 145:21 261:4 <b>coach</b> 50:13 165:23 174:25
--	--	--	---



[coaching - cone]

Page 13

<b>coaching</b> 48:12 201:7	<b>command</b> 158:17	125:5	<b>concern</b> 246:14 246:20
<b>cocaine</b> 88:5	<b>commentary</b> 19:23 173:14	<b>complete</b> 240:16	<b>concerned</b> 246:11
<b>code</b> 29:8	<b>commercial</b> 140:7 281:13	<b>completed</b> 169:4 291:16	<b>concluded</b> 285:22
<b>colleagues</b> 4:12	<b>commission</b> 287:23	<b>completely</b> 84:13 185:16	<b>conclusion</b> 151:20
<b>collect</b> 122:10	<b>common</b> 48:19	<b>completion</b> 178:23 289:4 289:11	<b>conclusions</b> 20:1 225:5,7 225:10 238:8 238:11 244:3,6 244:10 283:20
<b>collected</b> 261:17	49:8,14 65:22 82:5,24 83:4 89:4,5 194:24	<b>complicated</b> 69:18	<b>concrete</b> 34:7
<b>collecting</b> 246:12	<b>communicating</b> 79:20,22	<b>components</b> 63:18	<b>conditional</b> 155:6
<b>colorado</b> 98:14	<b>communication</b> 59:14 60:1 138:23 139:1 238:1	<b>comprehensive</b> 50:15 270:1	<b>conditioned</b> 79:25,25 80:15 132:20,22 133:10
<b>column</b> 252:18 275:3,5,5,17 276:11	<b>community</b> 44:15	<b>compromise</b> 102:16 103:8 127:7	<b>conditioning</b> 83:13
<b>comb</b> 271:4	<b>company</b> 37:22 38:14	<b>compulsion</b> 148:13 184:10	<b>conditions</b> 98:1
<b>come</b> 5:18 8:8 19:18 42:17 50:18 66:2 85:9 88:18 92:5 99:15 166:1 175:6 187:24 189:11 189:13 197:7 199:2 207:17 221:20 244:12	<b>compare</b> 144:1	<b>compulsive</b> 98:9	<b>conduct</b> 9:1,4 18:18 20:14 93:23 278:15
<b>comes</b> 117:18 174:6 188:22 245:11	<b>comparing</b> 180:19	<b>computer</b> 15:6 24:16 137:6	<b>conducted</b> 128:24 180:20 180:20
<b>comfortable</b> 146:17 217:18 281:22 284:7	<b>compartment...</b> 107:11	<b>concentrate</b> 92:13	<b>conducting</b> 198:12
<b>coming</b> 45:14 85:1 114:8	<b>compartment...</b> 108:12	<b>concentration</b> 200:7	<b>cone</b> 60:24 153:2
	<b>compile</b> 212:24 243:23	<b>concept</b> 63:23 153:4 157:21	
	<b>complaint</b> 23:11,12,16,20 23:24 24:4	<b>concepts</b> 45:11 154:7	

[conference - correct]

Page 14

<b>conference</b> 94:13	<b>consciously</b> 177:9	<b>content</b> 18:6 74:14	<b>contracting</b> 38:20 42:4
<b>confident</b> 68:14	<b>consensual</b> 281:14,15	<b>context</b> 20:9 21:1 42:1 48:2	<b>control</b> 87:14 87:25 184:17
<b>confined</b> 195:5	<b>consent</b> 179:18	48:3,3 51:20	185:4
<b>confirm</b> 131:14 141:4 249:8 279:22	<b>consider</b> 271:23	51:25 67:15 71:8 76:12	<b>controlled</b> 47:16 67:25
<b>confirmation</b> 174:8 177:6,7 177:10,13 189:10	<b>consideration</b> 22:10,13,22 23:3 32:1 287:14	82:14 100:9 125:10 155:17 155:23,23,24	<b>controlling</b> 121:10
<b>confirmed</b> 195:14	<b>considered</b> 22:16	160:3,21 161:18,21	<b>conversation</b> 4:18 70:23 135:2,6 137:3
<b>confirming</b> 133:23 192:24	<b>consist</b> 25:8	164:5 167:15 170:12 171:15	179:19 196:21
<b>confirms</b> 131:5	<b>consistent</b> 155:12 198:22	172:22 177:12	<b>cool</b> 6:15 216:5
<b>confused</b> 16:6 54:17 107:19 121:11 132:12 249:16 264:7	264:12	186:16	273:23
<b>confusing</b> 155:10 242:25 250:24	<b>consistently</b> 281:5	<b>contexts</b> 107:13	<b>cooler</b> 152:1
<b>confusion</b> 247:22	<b>consisting</b> 239:11	<b>contextual</b> 160:1	<b>copies</b> 15:12 291:14
<b>congress</b> 2:10	<b>consists</b> 240:2	<b>continually</b> 224:9	<b>copy</b> 14:25 144:4 248:10
<b>conjunction</b> 224:5	<b>constantly</b> 43:2 281:5	<b>continue</b> 61:4 88:22 149:14	288:23
<b>connect</b> 54:4	<b>consulting</b> 38:20	150:1 154:14	<b>copying</b> 159:1
<b>connection</b> 117:1 161:11	<b>consumed</b> 145:11	194:6	<b>core</b> 41:19
<b>connects</b> 151:12	<b>contact</b> 139:15 139:24 157:22	<b>continued</b> 30:6 30:8	<b>corner</b> 162:3 207:24
	<b>contain</b> 23:2	<b>continuing</b> 134:2 191:20	<b>correct</b> 12:25 14:11 15:23
	<b>contains</b> 289:8	195:8,14	16:1,4 18:4,9
	<b>contaminated</b> 224:10	<b>contraband</b> 76:14	18:19 21:10
		<b>contract</b> 37:13 38:2	23:9,14,22
			24:6 25:2,4,5
			26:9 27:9,12
			29:24 32:11
			33:12 34:14

**[correct - county]**

Page 15

37:4 40:21	219:9,18	261:11 262:6,9	276:1,14,15
41:1,1,15,21	222:12,25	262:13,14,17	277:2,9 278:1
42:6 46:20	223:16 226:11	263:20,25	278:5,8 281:2
50:1,4 53:24	227:16,18	264:19,20,22	287:3
58:7,14 60:11	228:3,6,8,11,13	265:3,11,12,13	<b>corrected</b> 151:8
61:9,13 69:1,3	228:14,18,24	265:14,15,17	<b>correction</b>
69:6 70:21	229:10,11,13	265:18,19,20	148:21,22
71:17 72:17	229:14,23,25	265:24 266:1,4	184:10
73:3,8,14,22	230:2,5,8,12,14	266:7,10,13,15	<b>correctional</b>
74:22,25 76:5	230:20,21,23	266:17 267:4,6	76:21
77:4 78:2	230:25 231:15	267:8,11,13,16	<b>corrections</b>
79:14 81:16	232:4 233:20	267:19,21,22	76:13
84:6 85:13	234:5,7,16,18	267:23,25	<b>correctly</b> 89:1
88:3,8 89:9,11	234:22,24	268:1,2,3,4,5,7	100:3 103:14
89:23 91:9,16	236:3,9 238:12	268:8,17,21,24	<b>correctness</b>
107:23 117:23	240:7 242:12	268:25 269:1,3	204:10
119:11,13,16	242:14 245:21	269:5,6,7,8,10	<b>counsel</b> 289:12
119:18 121:16	246:23 247:11	269:11,12,13	290:5 291:14
126:22 130:18	248:1 251:12	269:14,15,21	<b>count</b> 25:12
133:14 136:6	252:5 253:13	270:10,11,12	208:16 231:7
142:14 144:4	253:15,19,21	270:13,15,17	234:14 275:19
147:15 150:17	254:3,16,17,19	271:9,10,12,14	277:3
152:15 156:21	254:22,23,24	271:15,16,17	<b>counting</b>
157:23,25	255:18,19,20	271:19,20,21	202:12 204:8
158:10 166:10	255:24 256:4,7	271:22 272:8,9	<b>country</b> 63:3
166:16,18	256:10,12,14	272:10,11,13	64:10 65:1
175:16 179:6	256:15 257:21	272:14,15,16	77:13 116:2
179:23 187:3	257:23 258:2,3	272:19,20,23	<b>county</b> 1:9 2:19
188:10 192:25	258:6,7,8,12,15	272:24,25	4:14 9:4 24:7
193:23 201:11	258:17,23,24	273:1,2,3,5,6,7	24:10,12,20
202:2 205:24	259:2,5,9,12,16	273:8,9,10,14	29:1 34:10,12
206:8 212:13	259:17,23,24	273:15,16,17	37:14,17 42:3
214:8,9,24	259:25 260:6	273:18,19	43:18 90:21
217:2 218:9	260:17 261:9	275:9,13,14	115:1,22 142:8

## [county - decisions]

Page 16

145:19,23 243:19 287:7 288:9 290:1 <b>couple</b> 10:12 11:24 29:6 98:19 124:5,9 137:5 138:21 142:2 157:14 166:25 181:20 181:22 185:21 202:18 <b>course</b> 3:12 61:2 73:5,15 74:3,18 81:14 82:18 90:13 116:17 117:9 118:2 131:6 142:15 143:7 143:24 144:4,8 144:12 145:10 145:19 146:12 159:14 167:1 168:18 169:3 236:11 243:11 265:5 281:12 <b>courses</b> 38:17 38:17 72:23 73:2,23 74:15 75:3,7 144:21 281:11 <b>court</b> 1:1 4:17 4:24 6:3,7 14:1 98:15 194:12 261:25 288:1	<b>courtesy</b> 6:12 <b>courthouse</b> 263:15 <b>courtroom</b> 5:24 <b>cover</b> 22:1 32:14 189:9 <b>covered</b> 25:13 118:2 <b>covers</b> 74:19 <b>covid</b> 75:23 <b>coward</b> 86:20 <b>create</b> 111:14 144:8 152:18 <b>created</b> 78:15 158:22 202:10 <b>creates</b> 55:4 <b>creating</b> 109:13 144:10 244:5 <b>creature</b> 40:17 <b>creatures</b> 172:19 <b>crime</b> 125:15 <b>criminal</b> 14:12 280:22,25 <b>crouch</b> 160:15 <b>crunch</b> 201:22 <b>cs</b> 291:15 <b>csfrigeriolaw</b> 2:24 291:2 <b>csr</b> 1:20 289:22 <b>cubbyholes</b> 67:19 <b>cue</b> 50:3 51:14 51:21,22 52:2	54:6 57:10 58:11,16 <b>cued</b> 52:12 <b>cues</b> 50:6,17 52:21,23,24 53:19 54:4,11 54:12 55:14 56:14,18,22 <b>cuing</b> 49:10,10 49:14,19 103:11 <b>cumbersome</b> 38:5 45:22,23 45:24 213:3 <b>curious</b> 40:15 45:17 63:17 252:19 <b>currently</b> 37:13 <b>curriculum</b> 36:24 37:6 84:9 <b>cut</b> 16:17 62:9 111:16 270:3,3 <b>cv</b> 1:5 288:5 <b>d</b> <b>d</b> 178:2 <b>dangling</b> 171:12 <b>darn</b> 137:8 <b>dash</b> 30:23 <b>data</b> 48:4 61:24 279:23	<b>date</b> 28:16 207:9 208:5,7 208:9,12 240:19 242:7 249:15 286:3 289:6,22 <b>dates</b> 203:1 207:8 242:17 <b>day</b> 11:25 44:2 71:11 78:6 93:20 112:4 118:18,20 234:10 287:8 287:18 289:17 290:13 <b>days</b> 120:22 243:3 289:6 290:4,5 291:16 <b>deal</b> 16:24 127:4 <b>dear</b> 16:7 <b>decades</b> 50:17 74:3 <b>decent</b> 97:16 <b>decide</b> 18:20 151:20 262:4 <b>decided</b> 193:13 <b>decides</b> 65:22 <b>deciding</b> 282:19 283:16 <b>decimals</b> 46:14 <b>decision</b> 129:21 <b>decisions</b> 117:15,23
---	---	---	--

## [decisions - deputy]

Page 17

118:10 <b>dedicated</b> 154:2 <b>defendant</b> 2:14 12:2 13:5 <b>defendants</b> 1:9 2:19 288:9 <b>defense</b> 14:20 <b>deficient</b> 203:7 <b>define</b> 65:24,25 199:17 <b>defined</b> 142:13 160:10 <b>definition</b> 147:12 <b>definitive</b> 52:10 <b>degree</b> 133:1 137:15 138:11 162:2 183:23 185:4 261:22 <b>degrees</b> 35:23 <b>delay</b> 35:15 74:10 <b>delete</b> 274:5,6 <b>deletes</b> 133:8 <b>delivered</b> 288:21 <b>demonstrated</b> 94:9 <b>demonstration</b> 11:22 <b>department</b> 11:21 16:14 24:8 27:22	34:12 37:14 42:4 43:19 77:6 84:20 98:21 115:21 115:23 116:19 117:5,6 118:11 125:11 <b>department's</b> 106:8 <b>departments</b> 77:24 115:25 116:1 117:4 137:20 139:14 142:1 226:2 238:4,5 <b>depend</b> 52:4 77:5 81:11 184:1 <b>dependent</b> 154:19 <b>depending</b> 38:8 100:12 115:11 270:3 <b>depends</b> 68:18 85:17 100:2 136:20 <b>deploy</b> 98:23 113:3 162:1 179:18 279:10 <b>deployable</b> 44:21 <b>deployed</b> 11:24 133:22 279:10	<b>deploying</b> 43:21 76:24 159:17 181:19 <b>deployment</b> 8:15,19 14:2 14:10 16:12 17:25 21:1 26:13 28:10,23 29:3 43:22 48:3 56:4 58:16 59:21 61:11,24 71:15 71:19,24 102:15 112:21 126:16 128:12 158:16 168:15 168:22 169:7 169:10,15,22 170:9 172:7 178:24 180:17 180:21 198:5 199:1,23 203:20,22 206:7 239:24 240:2,21 249:8 278:7,21 279:2 279:2,9 280:18 <b>deployments</b> 47:14 70:20 112:21 139:12 165:17 170:15 198:23 244:11 274:23 275:1 275:11 276:2	277:21 280:19 <b>deponent</b> 289:2 289:3,10 291:13 <b>deposed</b> 5:14 10:20,25 11:4 11:5,7 <b>deposing</b> 291:13 <b>deposition</b> 1:12 1:16 4:23 7:13 11:14 13:4,12 29:18,19 30:6 205:17 282:15 282:17,22 283:1,11 285:10 286:3 287:2 288:12 288:19,21 289:4,11 <b>depositions</b> 5:20 13:18 <b>deputies</b> 115:23 118:7 <b>deputy</b> 4:13,14 8:23 9:7 17:25 18:17 19:7,10 19:24 20:1,8,9 20:15,25 25:7 27:10,10,11,11 27:25 28:7,20 28:25 29:19,23 30:6,18,20 31:4,20 37:9
---	--	--	---

[deputy - difficult]

Page 18

40:11 55:11,21 57:5 60:24 71:18 101:4 115:22 127:12 127:20 132:14 133:21,22 178:12 179:17 179:19 180:16 181:19,21,22 184:14 185:10 188:8 196:12 196:18,20,21 196:24 197:20 197:22 198:14 208:4,19,19 209:24 235:15 236:24 240:3 240:13 242:21 248:21 276:3 277:12 278:4 281:4 <b>described</b> 90:5 <b>describing</b> 85:12 <b>description</b> 3:10 224:15 225:17,20 287:10 <b>desert</b> 281:11 <b>desirable</b> 155:4 <b>detail</b> 3:14 22:22 208:20 238:17 240:13 248:22	<b>detailed</b> 215:21 217:23 233:7 250:12 <b>details</b> 225:9 <b>detect</b> 62:3 76:8 79:11 88:7,10 110:18 130:24 <b>detected</b> 88:12 <b>detecting</b> 61:12 80:22 89:1 96:25 132:21 <b>detection</b> 37:2 39:24 42:14 43:21,24 44:5 45:3 47:21 55:2,5,20 64:19 72:15 73:6,16,17,19 73:21 74:18,21 75:13,15,17 76:8 95:18 97:21 99:14 106:15,17 107:12,21 108:9 109:1,3 112:17 142:16 149:15 156:5 158:3 160:14 160:22 175:23 194:23 261:13 <b>detector</b> 3:12 18:1 75:12,20 75:21 76:2	87:6 142:20 145:16 195:2 261:12 <b>determination</b> 47:5 68:10 119:25 175:8 222:2 <b>determine</b> 48:15 53:22 66:15 67:14 68:13 120:18 128:2,5 154:3 221:8 <b>determines</b> 126:24 <b>determining</b> 47:2 75:22 <b>develop</b> 148:9 <b>developed</b> 97:16 <b>developing</b> 138:6 <b>devices</b> 75:19 <b>devoted</b> 22:10 23:3 <b>difference</b> 43:8 79:1 86:5 94:11 111:3 112:15 129:11 141:25 271:8 <b>different</b> 24:15 26:15,15,15,17 31:8 39:3 43:10 44:14	54:21 55:12 57:23 60:14 63:22 68:8 73:9,11,12 79:1 80:17 81:24 82:20 106:5 108:18 108:21 109:2,6 112:12,14 113:7 119:4 122:19 128:11 132:6 137:1 140:10,20 157:1 159:24 160:4 161:1,8 161:17 163:4 163:19 166:22 166:23 183:8 183:10 191:22 203:24 209:24 210:24 211:6 221:12,16 239:11,12 260:8 <b>differently</b> 176:2 217:13 243:6 278:12 <b>difficult</b> 34:6 39:13 54:22 66:15 68:3 116:24 117:14 176:11 190:9 221:7 222:1 224:21
---	--	---	---



[difficulties - dog]

Page 19

<b>difficulties</b> 99:23 116:24	<b>discussion</b> 35:13 74:8	172:12 183:7	<b>ditch</b> 184:3
<b>dig</b> 81:5	94:2 121:12	183:13 185:9	<b>diversion</b> 224:2
<b>diligent</b> 120:13	128:14 173:18	185:11	232:23
<b>direct</b> 96:20	178:18 248:18	<b>distraction</b>	<b>diversions</b> 45:7
117:1	266:23 279:24	185:15 223:23	140:4 211:14
<b>directability</b>	280:6	232:24 233:10	212:2 215:16
168:17	<b>dismissed</b>	233:12,19	215:17 224:11
<b>directed</b> 195:3	13:10	<b>distractions</b>	278:19
<b>directing</b>	<b>disobedience</b>	45:7 140:4	<b>diverted</b> 63:16
184:14	152:7,14	207:10 211:15	170:19 172:11
<b>direction</b>	191:16	211:21,22,23	185:9 187:7
184:25 212:20	<b>disobedient</b>	212:2,11,15	<b>divided</b> 236:12
<b>disagree</b>	152:2,3	214:7 215:11	236:22
209:16	<b>dispatch</b> 24:12	215:14,16,18	<b>divider</b> 236:19
<b>disclosure</b>	24:16,17,20	217:3,6,20	<b>divine</b> 243:21
285:8	<b>dispersions</b>	218:12 220:2	<b>division</b> 1:2
<b>disconnected</b>	64:22	220:22 222:10	115:20 288:2
74:7	<b>display</b> 46:3	222:25 223:1	<b>dock</b> 49:11
<b>discourages</b>	165:4 172:16	223:18 224:12	60:14,19
89:14,15,17	<b>displayed</b>	227:17 228:7	<b>doctrine</b>
<b>discover</b>	79:16	228:19 229:12	195:21,23
167:19	<b>displaying</b> 90:2	230:1,13,24	<b>document</b> 6:16
<b>discovered</b>	172:8	231:17 232:5	15:16 16:2
53:16 92:2	<b>displays</b> 81:9	232:18 234:6	25:3 26:20,25
186:24	<b>dispute</b> 235:11	234:23 236:6	124:11 143:7
<b>discretion</b>	<b>disseminate</b>	278:19	206:19 239:9
261:23	155:25	<b>distractor</b>	287:11
<b>discussed</b> 18:17	<b>distillation</b>	224:2 233:5	<b>documents</b>
32:9 33:15	145:14	<b>distractors</b>	6:15 9:16
282:3 284:19	<b>distinguished</b>	219:21	10:14 31:23
<b>discussing</b>	141:23	<b>distribute</b>	205:14 239:21
31:24 100:18	<b>distracted</b>	233:4 272:2	282:3 284:21
275:11	170:19 171:6	<b>district</b> 1:1,1	<b>dog</b> 3:12 8:24
		288:1,1	10:25 11:14,24

[dog - dog]

Page 20

12:14,17 14:2	82:13,13,18,21	127:12,13,14	164:14 165:6
14:9 16:13	82:22 83:7,15	127:25 128:25	166:4,6,15
18:1 40:16,19	83:16,24,24	129:4,10,12,21	167:7,18 168:1
40:20 41:2	84:19 85:1,8	129:21 130:23	168:2,8,20
43:22 44:21	85:18,23,24,24	130:24 131:4	169:13,20,21
45:8,19 46:1,4	86:2 87:6,16	131:10,11,17	170:4,7,8,9,9
46:7,19,25	87:17,21 88:9	131:20,23	170:17,18,22
47:23 49:5,6	88:11,24 90:1	132:2,10,11	171:2,5,7,8,9
49:11,14,15,20	90:17,18,21	133:8 134:1	171:15,16
50:11,21 51:18	91:3,5,7,11,23	136:16 138:3	172:8 174:4,6
51:24 52:2,6,7	91:24,25 92:2	139:5 142:2,20	174:7,16 175:1
52:10 54:8,15	93:8,12,16,24	145:16 147:9	175:5,6,11,21
55:4,7,17 56:7	94:6,10 96:24	147:17,25	175:22,25
56:10 57:9	97:21,25 98:5	148:10,16	176:12 177:3,5
58:1,19 59:9	98:6,15 100:1	149:14,17,24	177:6,9,21
59:12,14,17	101:7,8,13,15	149:25 150:19	178:23,24
60:2,3,19	102:14,16	151:5,7,15	180:6,6,12,14
61:10,23 62:2	103:7,11,14	152:2,5,19,21	181:4,9 182:5
62:5,19 63:2,4	104:4,6,8	153:1,3,5,14,16	182:6,20 183:1
63:14,20 64:20	105:9 106:15	153:16,19,20	183:2,6,10,20
65:22 66:1,5	106:21,21	153:22,23	184:2,8,17,18
66:10 67:20	107:6,19 108:1	154:10,12,16	185:2,4,8,17,19
68:11,13,15	108:10 109:1,1	154:17,20	186:4,19,22
69:11,15,17,25	109:3,8,12,17	155:3,10,19,25	187:8,19,19,23
70:1,4,16 71:7	110:5,9,16,22	156:24 157:3,4	187:24 188:15
72:7,14,19,21	111:4,5,8,16	157:5,6,14,15	189:3,5,12
72:21 73:6,16	112:4,13,18	157:16,24	190:19 191:14
74:21 75:12,17	113:1,3,12,13	158:2,2,2,14,15	191:14,21
75:20,23 76:2	113:22 116:3	158:23 159:2,8	192:7,8,9,18,18
76:2,8 77:2,15	116:21,23,25	159:17,18,22	192:22 193:3,4
77:20 79:17,19	120:4,4 121:4	160:3,6,9,21,25	193:7 194:24
79:20,25 80:4	121:8 122:14	161:1,8,19	195:6,14
80:13,22,25	122:24 124:2	162:1 163:6,8	198:17,19,22
81:1,9 82:2,11	126:1,24	163:14,22,22	199:21,24

[dog - drug]

Page 21

201:9,23 203:4	130:21 134:13	137:6 138:3	<b>doubt</b> 274:14
203:5 211:8	135:10 138:4	139:10 140:2,9	279:25
237:25 246:7	140:10,10	140:11 144:25	<b>downstream</b>
261:13 278:20	142:3 144:17	147:10 148:4	84:12 117:10
<b>dog's</b> 48:14	150:25 155:17	153:11 154:11	<b>draft</b> 9:14 10:9
49:5,6,24	160:14 167:17	155:18 158:3	10:11,15
51:11 58:12	170:15 172:16	160:4 163:4	<b>dramatic</b>
66:5 100:20	175:19,19	166:2 176:1,10	113:21 127:16
105:17 112:19	176:13 181:2,2	180:7 181:5	176:24
122:1 147:24	186:21 198:19	182:15 183:21	<b>dramatically</b>
148:1 161:3	198:21 199:11	187:14,20	81:11 128:11
162:21 165:21	199:14 200:22	188:15,17	<b>drats</b> 146:9
168:16 174:19	200:24 201:1	190:3,4,7,8	<b>draw</b> 225:4,7
181:9 186:22	224:4	191:4,20	225:11 238:10
<b>dogs</b> 39:24 51:4	<b>doing</b> 4:9 10:1	193:15 194:19	244:6,9,16
62:13 65:1	37:11 42:2,4,7	209:16 214:23	284:2
66:3,18 70:16	43:2,18 44:5	215:18 222:3	<b>drawbacks</b>
73:18 75:15,21	46:24 47:6,13	235:11 237:5	99:7
76:14,15,24	47:15 48:18	244:1 245:17	<b>drawing</b> 238:7
79:11 81:5	49:17,20 57:1	247:24 278:23	284:7
83:13 85:21	58:23 63:16	280:18	<b>drill</b> 201:19
86:14 87:6,10	64:19 68:20	<b>doj</b> 125:13	<b>drills</b> 209:24
92:21,23 93:20	83:24 91:5,23	<b>donna</b> 1:20	<b>drive</b> 189:12
96:6,11,23	96:7 100:3	4:17 288:14	263:14 267:2
97:2 98:17,20	104:2 105:7,15	289:22	<b>driver's</b> 182:3
98:24 99:5,8	107:5,5,7	<b>donna's</b> 4:23	<b>drop</b> 54:8
99:14 102:13	108:9,14,15,25	<b>door</b> 164:19	<b>dropbox</b> 7:15
102:18 106:8	111:9,19,23,25	182:3 193:20	21:24 24:2
106:20 107:4	112:4,5,11,18	194:25	25:18 30:15
107:16 113:10	113:2,11 115:3	<b>dopamine</b> 90:9	282:7,10 285:9
113:14,15	120:14 123:6	<b>dope</b> 75:15	285:11
116:4 117:12	124:20 125:16	85:24 175:22	<b>dropped</b> 77:18
118:13 122:5	126:11 131:23	<b>double</b> 69:23	<b>drug</b> 76:18
126:17,20	135:10,21		78:6 94:20

## [drugs - entire]

Page 22

<b>drugs</b> 56:5 66:19 110:18 126:3 133:24 160:23 193:21 193:22 196:25 197:20 200:22 265:4,12 266:5 267:12 277:13	103:20 104:25 121:3 130:21 135:3 140:15 141:23 142:18 171:1 176:15 177:16,16 183:12 202:11 237:24 242:16 264:9 278:4,11 280:14 282:3	<b>effect</b> 53:2 177:14 192:9 278:22 <b>effective</b> 145:16 <b>effort</b> 39:12,19 116:24 <b>eight</b> 34:17,18 100:13 105:2 106:9 107:21 231:11 275:18 275:23,23,24 276:3,5,6,18,23 277:6 <b>either</b> 30:5 47:23 48:18 66:21 92:11 148:23 203:19 203:21 208:6 226:9 227:17 262:5 269:23 282:15 <b>electronic</b> 75:18 122:11 <b>elements</b> 134:5 134:5,7 <b>eliminate</b> 207:11 <b>else's</b> 157:2 <b>emanating</b> 153:13 <b>emotion</b> 161:8 <b>employed</b> 5:4 289:13	<b>encompass</b> 117:24 <b>encounter</b> 12:15 <b>encounters</b> 281:14,15 <b>encourage</b> 175:20 <b>encouraged</b> 161:2 <b>encouraging</b> 149:14 <b>ended</b> 142:21 193:9 209:1,7 215:1 <b>energy</b> 166:7 166:15 <b>enforcement</b> 5:7 34:21 36:23 37:25 38:18 76:11,13 77:16 281:9 <b>engaged</b> 137:22 209:3 <b>engaging</b> 60:21 <b>ensure</b> 94:6 126:17 128:20 136:4 <b>ensuring</b> 138:19 <b>enter</b> 131:16 <b>entered</b> 208:18 <b>entire</b> 34:3 178:20
<b>dual</b> 106:20,21 107:4,19,25 108:25 127:12 <b>dude</b> 175:3 <b>duffle</b> 164:20 <b>duly</b> 1:17 4:2 288:17 <b>dump</b> 262:3 <b>duplicate</b> 216:6 <b>duties</b> 126:12 128:19 <b>duty</b> 116:3 127:19 130:15 137:22 <b>dvds</b> 72:5,13,21 <b>dynamic</b> 70:25 144:18	<b>earliest</b> 208:9 208:12 249:1 249:15 <b>early</b> 11:8,8 53:9 67:18 68:3 90:4,21 93:11 156:24 202:24 <b>earn</b> 170:1 <b>earns</b> 58:20 <b>easier</b> 146:11 146:15,19 <b>easiest</b> 158:21 <b>easy</b> 175:7 <b>edge</b> 96:17 <b>edit</b> 16:18 <b>edited</b> 85:15 <b>educating</b> 116:13 <b>education</b> 21:7 32:10,15,23 33:25 54:25 55:11 86:3 117:23		
<b>e</b>			
<b>e</b> 2:1,1 37:18 <b>earlier</b> 33:11 54:10 65:10 70:15 75:8 80:21 82:4 88:15 89:25 94:2 100:6			

[entirely - exhibits]

Page 23

<b>entirely</b> 25:8 161:8 191:22 205:14	202:4,5	214:23 216:7	<b>except</b> 150:20
<b>entirety</b> 21:23 28:20	<b>estimates</b> 221:9	241:2	287:3
<b>entities</b> 38:1 39:3,4	<b>estimation</b> 40:11 202:20 202:23	<b>exam</b> 64:2	<b>excited</b> 177:11
<b>entitled</b> 285:7	<b>et</b> 13:3 291:4	<b>examination</b> 3:5 4:3	<b>excluded</b> 14:17
<b>entity</b> 73:9,11	<b>evaluate</b> 45:19 47:7 224:19 238:2	<b>examinations</b> 39:2	<b>executed</b> 287:13
<b>environment</b> 47:16 67:3,17 67:25 68:14 109:12 167:20 182:17 212:10 224:17 225:18	<b>evaluating</b> 48:2 134:12	<b>example</b> 34:8 41:7 47:20 49:19,24 56:24 61:20 67:8,18 83:2 86:17 93:20 95:11 101:21,22 102:25 103:11 118:12 123:1 125:25 126:4 130:14 151:4 158:2 166:7 176:18,20,22 177:18 202:24	<b>exercise</b> 138:12 239:19 247:8 248:5 274:15 279:22
<b>environments</b> 45:7 212:1	<b>evaluation</b> 224:21	<b>examples</b> 50:18 54:10 56:21 90:19 92:5 132:6 165:8 173:5	<b>exercises</b> 107:9 137:5 138:6
<b>equally</b> 55:23	<b>event</b> 39:20,21 59:6 88:19 285:11	<b>eventually</b> 110:22 182:1	<b>exhibit</b> 3:11,12 3:13,14,15,20 3:21,22 14:25 15:2,11 16:2 72:2 143:3,14 143:16 177:23 178:1,4 204:14 204:15,18,23 205:2 206:9,11 207:16 238:24 239:10,11,11 239:13,15 240:2 247:2,11 247:21 248:1,9 248:16,19 251:15 274:11 279:16,17,20 280:12
<b>equipment</b> 72:20 102:18	<b>everybody</b> 59:24 92:17 161:22	<b>excel</b> 3:16 207:8,8,9 240:18 248:7 274:1,14 279:16,19,23 279:24	<b>exhibits</b> 3:9,18 30:4,7,14 283:19
<b>equivalent</b> 243:7	<b>evidence</b> 196:24 197:25 198:2 211:22 261:17	<b>excellent</b> 137:4	
<b>errata</b> 291:11 291:13,16	<b>evolved</b> 186:21		
<b>error</b> 49:16 209:15	<b>exact</b> 112:25 201:17		
<b>escaping</b> 225:9	<b>exactly</b> 12:8 103:3 109:22 113:16 145:12 152:23 190:3,4 199:10 201:14		
<b>esquire</b> 291:1			
<b>essential</b> 145:16 150:16			
<b>essentially</b> 135:8 154:11			
<b>estimate</b> 38:21 38:22 202:3,3			

[exist - fair]

Page 24

<b>exist</b> 139:11	<b>expires</b> 287:23	<b>extreme</b> 177:19	147:11 275:7
<b>expect</b> 149:5,6 278:25	<b>explain</b> 78:20 152:5 158:21 184:18	<b>extremely</b> 139:13	<b>fair</b> 14:10 22:21 23:6 26:1 31:6
<b>expectations</b> 47:18 87:11	<b>explained</b> 71:10	<b>eyes</b> 137:25	32:13 34:23,24 40:3,4,5 41:25 52:20 71:7 73:23 74:13 77:7 85:3 102:5 110:20 122:4 145:10 193:14 206:3 207:19 208:20 209:10 210:15 210:18 213:16 213:19,22 215:25 220:6 220:10 221:25 222:20 223:9 223:11 227:6 229:2 231:6,12 232:14 233:18 234:15 235:16 235:21,24 236:8 237:9,15 240:1 241:4,10 242:1 243:23 251:9 252:8,23 253:23 254:4,7 254:11 257:10 257:14,16 260:11 261:5 264:24 267:15 274:24 275:2
<b>expected</b> 46:3	<b>explaining</b> 20:25	<b>f</b>	
<b>expedite</b> 32:13	<b>explanatory</b> 24:9	<b>f</b> 120:4	
<b>experience</b> 21:7 32:10,14,23 33:17,18,25 34:4,22 50:8 50:17 58:2 74:2,16 76:1 90:20 99:2 115:2,9 117:7 117:12 136:9 172:6 280:18 281:6,8	<b>explore</b> 36:15 151:19	<b>face</b> 11:25 77:9	
	<b>explosive</b> 81:24 140:10	<b>facilities</b> 76:21	
<b>experienced</b> 101:15	<b>expressed</b> 278:9 287:15	<b>facing</b> 190:19	
<b>expert</b> 11:11 12:23 13:19,22 14:9 15:19 16:2 17:1 20:14 21:5 280:21 281:3,4 281:18,23 282:23	<b>extensive</b> 40:2 73:25	<b>fact</b> 32:5,7 47:3 64:25 84:3,16 174:17 198:21 283:19	
<b>expertise</b> 21:7 32:15 280:15 281:7,8	<b>extent</b> 23:23 28:25	<b>factor</b> 201:4	
<b>expiration</b> 289:22	<b>extinct</b> 89:8 90:4	<b>factual</b> 283:11	
	<b>extinction</b> 88:15,18,19 89:5 91:13 98:8 131:17	<b>fades</b> 88:23	
	<b>extinguish</b> 54:2 166:4	<b>fail</b> 61:3,4,15 63:4 66:6 69:10,16 70:4 147:11 148:3 148:10	
	<b>extinguishes</b> 66:7	<b>failed</b> 245:24 275:2,12 276:5 276:6,12,17	
	<b>extinguishing</b> 165:25	<b>failing</b> 60:17,20 62:4,14,20	
	<b>extract</b> 12:18	<b>fails</b> 62:3 291:18	
		<b>failure</b> 48:24 49:1,4,4,5 89:18 101:16 103:15,17 123:22,23	



[fair - finish]

Page 25

275:21 276:4 277:1,7,13,16 277:17,22 279:7 <b>fairly</b> 51:19 115:21 183:1 192:5 201:22 <b>fake</b> 133:10 <b>fall</b> 49:17 61:18 63:21 142:3 <b>fallibility</b> 201:4 <b>falling</b> 48:9 63:11 <b>falls</b> 23:7 149:9 <b>false</b> 44:7 45:16 61:8 62:14 65:19 66:9,14 67:6,10,14,21 67:23 68:7,11 69:10 70:1,2 128:25 129:5,8 129:16 140:16 140:21 <b>falsely</b> 69:15 <b>familiar</b> 26:20 27:4 64:17 <b>familiarity</b> 21:7 <b>far</b> 52:25 84:11 89:3 159:20,25 194:3 197:20 197:24 247:5 <b>farm</b> 78:16 95:3,16	<b>fast</b> 6:21 86:22 228:22 <b>fat</b> 106:3 <b>fault</b> 275:4 <b>faulty</b> 174:8 <b>february</b> 231:19 233:21 269:9 270:7,14 272:8,12 <b>federal</b> 1:23 14:1 98:23 285:7 <b>fedora</b> 53:24 54:7,9 <b>fee</b> 15:24 16:3 <b>feel</b> 18:25 19:9 32:19,21 33:24 35:19,24 36:3 86:17 87:3 122:19 140:13 200:5,7 231:8 240:19 278:12 281:22 283:10 283:23 284:10 <b>feels</b> 87:1,7 <b>feet</b> 164:21 191:8 <b>fell</b> 11:25 35:9 129:1 164:20 <b>felt</b> 19:14 44:10 175:16 284:1,7 <b>field</b> 47:15 50:16 58:9 74:3,24 81:13	92:20 112:20 115:2 126:18 128:1 130:17 241:16 252:17 255:6 260:18 268:14 272:18 <b>figure</b> 35:6 48:8 61:19 95:14 96:2 113:10 114:17 204:5,5 224:8 <b>figures</b> 207:18 251:16 <b>file</b> 203:25 240:16 <b>fill</b> 209:14 <b>filled</b> 28:9 <b>final</b> 10:15 <b>finally</b> 174:20 <b>financially</b> 289:15 <b>find</b> 17:17 42:20 55:8 60:23,23 66:19 69:22 75:23 87:18 96:21 97:13 107:2 129:14,14 130:6 131:7 139:21 146:6 147:1 153:4,6 153:12,13 155:4 156:19 160:8 163:6	168:9,10 172:24 175:15 188:23 189:7 207:21 209:22 214:11 219:5,6 219:7,8 220:12 221:3,5,6 224:4 225:13 225:16,23 246:6 249:1 250:21 257:7 261:16 <b>finding</b> 76:17 91:3 211:10 <b>finds</b> 75:18 83:9 176:10 221:1 224:7 241:8 244:12 250:18 251:23 <b>fine</b> 5:8 10:8 17:19 24:3 52:20 56:10 64:9 80:8 105:11 108:10 169:20 196:10 204:2 218:14 223:7 250:16 263:13 <b>fingers</b> 51:8 158:14 234:14 <b>finish</b> 6:12 67:22 162:7 226:21
---	---	---	--

[firm - found]

Page 26

<b>firm</b> 289:24 290:19	<b>flipping</b> 123:21	<b>folks</b> 14:25	138:1,1 210:21
<b>first</b> 4:2 11:9 11:10 16:6 22:4 30:5,9 31:18 64:11 77:12 82:9 109:6 127:2 129:3 144:7 150:9 177:24 183:3 209:13 214:1 242:4,7 242:11 282:21	<b>florida</b> 94:8	81:17	211:1 220:24
<b>flush</b> 82:11 83:24	<b>flushes</b> 83:10	<b>follow</b> 98:8 106:8 135:1 150:14 159:20 264:10	255:12 290:8
<b>flushing</b> 80:25 85:10 109:9 160:6,13 167:21	<b>focus</b> 8:17,18 19:7 22:14,18 44:25 75:16 76:1 79:8 81:20 120:18 121:14 139:4 168:9,16 182:7 182:25 184:7 185:19 187:7	<b>followed</b> 55:10 133:5 175:8 243:7	<b>formal</b> 59:23 59:24 180:10 180:11
<b>fishing</b> 186:12	<b>focused</b> 18:17 22:20 106:16 111:22,23 113:8 124:13 124:18 134:16 175:15 185:16 241:23	<b>follower</b> 168:14	<b>formalized</b> 59:16
<b>fit</b> 23:5	<b>focusing</b> 122:23 125:22 212:21,22	<b>following</b> 22:6 22:9 41:6 104:7 111:17 128:21 147:8 154:18 265:9 288:16	<b>format</b> 222:1
<b>five</b> 68:20,23 68:24,25 69:5 69:13 156:4 202:15 210:14 213:19 215:4 220:9,25 227:8 231:11 247:1 275:17,22 276:23 277:5	<b>folded</b> 233:2	<b>food</b> 110:12	<b>former</b> 27:11
<b>fix</b> 123:10 127:9 148:7	<b>folder</b> 25:19 30:15 282:7,10 285:9,11	<b>fool</b> 66:3	<b>forming</b> 21:15 198:13
<b>flawed</b> 64:9		<b>footage</b> 125:3,6 126:6,9,17 128:2,20 132:10 133:20	<b>forms</b> 218:8 221:14,17,21 223:21 224:25 225:6 226:8,13 240:19 243:23 279:25 280:2
<b>fled</b> 12:16 113:25		<b>force</b> 16:12 117:19	<b>fortunately</b> 247:5
<b>flip</b> 146:2 212:18 214:2 241:10 274:11		<b>foregoing</b> 22:6 287:1,12	<b>forward</b> 197:6 197:8
<b>flipped</b> 124:5 206:24 225:2		<b>forever</b> 45:1 101:8 159:15	<b>found</b> 54:8 61:7 66:19,19 90:23 92:15 126:3 146:25 155:8 193:20 193:22 196:25 197:20 198:6,9 225:15 241:9 245:1 250:18 251:1,3,23 253:6,20 254:10,23
		<b>forget</b> 201:14	
		<b>forgot</b> 16:17	
		<b>form</b> 28:9,10 103:1 104:9	

[found - george]

Page 27

255:24 256:11 256:19 258:2 258:12,24 259:9 261:2,14 262:10 264:19 265:4,12,19 266:5,14 268:9 270:10,16,16 271:3,21 276:9 <b>foundation</b> 83:19 84:8,16 84:18 85:2 109:6 110:23 162:23 <b>foundational</b> 110:16 <b>foundations</b> 83:17,22 109:4 <b>four</b> 5:17,18 10:21 46:8 47:8,22 60:17 68:20 77:17 88:6,10 100:13 105:1 106:8 107:21 190:13 191:8 202:15 210:14 213:19 215:4 216:22 216:22 220:9 221:1 222:16 223:11 227:25 228:12 229:20 230:7 231:10 232:12 233:24	265:19 275:17 275:22 276:23 277:4,4,12,13 277:20 <b>fourth</b> 13:12 <b>fox</b> 2:3 4:13 14:25 273:24 274:3,8 <b>frankly</b> 120:7 264:14 <b>frcp</b> 289:1 <b>free</b> 231:8 <b>frequency</b> 46:23 119:14 137:15 <b>frequently</b> 139:24 <b>friend</b> 173:11 <b>frigerio</b> 1:22 2:20,21,21 4:15,15 6:24 8:1,10 16:7 18:25 21:25 24:1 31:11,19 35:2,7 74:7 103:1 104:9 207:25 214:13 214:15 220:24 256:24 257:2 284:1,19 285:18 288:22 291:1 <b>front</b> 99:23 165:4 171:9,14	180:2 206:23 240:14,18 274:15 <b>frustrated</b> 191:10 <b>ft</b> 289:24 290:18 <b>fulfill</b> 87:11 <b>full</b> 5:2 6:16,17 38:10 129:9 164:20 165:5 <b>fully</b> 226:13 <b>fundamentals</b> 74:20 75:2 <b>funky</b> 207:3 <b>further</b> 134:9 184:25 289:1 289:12,15 <b>future</b> 78:8 103:8 149:14 285:10 <b>fuzzy</b> 97:7 156:2 <b>g</b> <b>g.com</b> 2:17 <b>gained</b> 74:2 <b>gains</b> 101:13 <b>gals</b> 142:3 <b>gamble</b> 66:12 131:22 132:1 146:25 147:1,9 <b>gambled</b> 68:12	<b>gamblers</b> 66:3 <b>gambling</b> 51:25 52:3,6,11 65:22,25 66:1 67:9,9,20,23 89:24 90:5 103:20,21 104:7 128:3,25 133:8 147:18 147:22 148:25 149:4,14 201:3 201:5,9 <b>gander</b> 239:15 <b>garrob</b> 27:11 <b>gears</b> 238:23 <b>general</b> 5:19 29:7 62:10 73:18 90:4 114:22 195:3 <b>generalization</b> 62:21 <b>generalizations</b> 115:6 <b>generalize</b> 71:6 <b>generally</b> 45:2 85:8 100:17 105:3 115:8 194:22 195:2 195:12 226:1 261:15,17 <b>generate</b> 122:13 <b>george</b> 139:3
--	--	---	--

[germany - goes]

Page 28

<b>germany</b> 46:1 53:9 <b>gesturing</b> 108:18 <b>getting</b> 26:6 41:18 53:23 56:13 62:25 84:3 88:2 96:22 101:23 103:3 104:25 105:10 111:8 113:1,2,24 122:3 125:21 126:10 132:11 137:13 142:19 154:17 155:1 156:24 160:18 160:19 169:8 181:6,9 183:7 183:13,15 185:11 217:23 245:9 248:6 268:18 280:15 <b>gigantic</b> 125:14 <b>gist</b> 182:9 <b>give</b> 5:1 6:2,6 6:12 8:14 9:25 10:2,4,23 11:19 19:16 28:16 30:1 34:8 39:13 41:7 44:23 47:19 48:22 61:20 62:10	63:19,20 71:5 83:2 86:17 89:19 90:19,20 93:19 101:21 116:13 123:1 125:10 138:1,2 143:4 149:10 149:13 153:5 153:14 164:18 167:12 176:12 176:17 177:5,7 177:9 200:8 211:7 223:5 263:16 283:1 <b>given</b> 19:15 31:8 82:21 112:4 148:17 176:22 219:2 224:15 240:21 241:6 249:24 249:25 287:17 288:19 290:10 <b>gives</b> 21:1 157:6 161:17 174:15 <b>giving</b> 50:10,12 66:4 89:12 90:1 160:21 163:15 164:3 227:10 <b>glaring</b> 124:6 <b>glass</b> 165:4 <b>glebe</b> 2:4	<b>global</b> 121:20 <b>gloves</b> 224:6,7 <b>go</b> 7:5 9:12 15:4 17:20 18:5 23:10 25:12 28:23 29:12 35:11 39:19 40:17 41:1,1 42:23 44:3 48:1 49:1 53:12,12 58:25 59:9 60:5 62:7 64:1,1,3,3,20 64:20 65:10 72:2 79:9 82:13 83:22 87:9 91:4 99:12 104:4 111:15 113:25 116:16 117:8 118:6,18 127:4 127:9,22 129:22 130:5 135:19,25 138:14 139:18 139:21 140:21 141:9 143:10 146:5,14 150:19 151:9,9 152:12 153:1,3 153:23,24 156:4,4,8 157:15 158:14 159:7,10 160:7	162:6,24 168:9 170:5 171:11 173:14,19 185:21 188:23 189:5,20 190:23 191:15 192:12,25 194:3 197:7 207:16 209:15 213:9,25 214:11,23 217:8,10 219:2 219:22 221:5 224:9 225:13 225:22 226:25 231:20 237:6 241:22,25 244:18 248:4 250:17 251:15 261:20,25 262:3 263:18 271:4 282:19 283:8 <b>goal</b> 98:5 126:15,15 135:13 <b>goals</b> 136:2 <b>goes</b> 26:7 54:9 60:4 62:2 77:12 94:19 116:25 126:11 131:17 132:2 134:16 175:2 179:19 187:9
---	--	---	---

[goes - grades]

Page 29

189:25 192:9	146:10 147:5	219:13 221:17	<b>good</b> 4:5,6,10
193:7	149:8,8,10	223:2,5,8	4:11 5:5 43:13
<b>going</b> 4:18 5:9	150:18 151:4	226:21 228:22	45:4 55:17
5:13 6:3 10:1	155:7 159:9,13	228:24 229:4	56:8,10 86:17
14:24,25 16:20	159:14,17	229:17 230:5	87:1,3,7 96:7
16:25 38:22,23	160:8,25	231:3,22	125:8 131:11
45:10,10,11	161:21 163:19	232:10,22	132:2 146:22
51:23 52:24	165:23 166:20	233:22,24	155:24 158:20
53:3 54:17	166:21 171:11	234:1,8 235:6	171:19 173:5
55:4 56:16	173:16,19	235:7,12	173:20 176:13
58:4 59:9,15	176:11 177:23	236:10,14,19	176:18 177:4
61:3 62:4,7,16	178:1,3 179:4	237:5 238:2,4	177:11 181:2
62:24 64:11,11	179:5,12 180:5	238:24,25	186:16 187:20
65:24 70:3	180:15 181:11	239:4,5,8,12	189:6 247:7,12
72:3 77:10,13	181:14 182:17	240:17 241:4	<b>gotcha</b> 34:19
77:13 78:5	182:24 185:22	241:25 242:20	35:1 140:15
80:4 85:9,9,14	186:2,15	243:21,22	141:14 162:6
85:16,23 87:10	187:17,21,21	244:14 246:17	184:6 196:6
89:21 90:11	189:2,21,24	247:20 248:4	205:21
98:23 101:21	190:15 191:10	248:12,13,15	<b>gotten</b> 20:5
109:19 111:4	191:12,14	249:1,18,19	122:16
111:14 112:2	192:12,17,24	250:7 251:19	<b>government</b>
113:25 114:5,6	194:3 195:7	252:25 253:16	14:21,22
115:13 116:13	196:7,11,17	253:25 256:22	<b>grab</b> 58:3
119:2,6,7,9	197:7 198:7	259:21 260:13	<b>grabbing</b> 58:5
120:25,25	204:14,16	265:8,21 267:9	<b>grade</b> 45:20
125:16 129:3	206:10 207:2	267:17,24	46:8,19 48:6
129:23,24,25	209:13,14	268:6 273:22	48:16 62:4
130:1,2,5	211:5 212:16	273:25 275:4	63:19,20,22
131:7,9,19,21	214:10,11,12	276:11 280:12	64:16
132:13 135:25	215:1,23,23	285:5,10	<b>graded</b> 63:24
138:2 140:11	216:3,14,18	<b>golden</b> 51:3,5	<b>grades</b> 46:2,2
141:7 143:2,3	218:3 219:10	52:19 57:11	64:19 119:25
143:10 146:5,6	219:10,11,11	86:19 158:12	

**[grading - handler]**

Page 30

<b>grading</b> 45:19 46:12,24,24 47:12,13 48:18 48:21 60:14 61:17 70:1	<b>growing</b> 99:1 <b>guarantee</b> 101:7 <b>guess</b> 5:4,22 9:10,25 11:3 17:6,21 18:23 19:13 24:23 25:24 26:6 31:15 32:18 80:8 92:18 101:20 104:4 110:5 111:8 136:21 144:7 169:5 183:5,25 184:12 185:10 196:16 210:23 269:25 284:14	<b>half</b> 160:15 271:25 272:2 <b>hand</b> 14:25 15:11 51:7,13 52:1,13 109:11 109:20 131:10 131:20 158:13 158:16,24 159:19 161:3 178:3 181:23 181:24 183:1,5 185:16,20 190:4,7,24 191:4 192:14 209:18 235:7 238:24 247:3 274:12 287:17	46:19,25 47:23 48:4,6,9,16,17 48:19 49:9,10 49:19 50:2,10 51:12,18,22,24 51:25 52:1,7 52:11 54:14 55:3,15 57:3 58:15 59:20 60:3,15 64:15 64:20 66:13 70:24 71:7 79:21,22 80:10 81:19 82:22 83:12,16,23 84:20 86:1,2 87:14 88:25 90:1 93:21 99:15 100:1,3 102:14 103:7 103:20 104:1 111:1 112:2,16 113:8 116:21 116:23,25 117:7 118:5,25 119:5,19,19 120:13 126:25 128:3 130:23 131:3,4 132:2 132:10 136:23 138:25 152:21 153:2,19,21 154:18,19,25 157:4 159:18
<b>graduates</b> 110:22	<b>guessing</b> 270:25	<b>handed</b> 45:25 54:25 143:23 205:1	
<b>gram</b> 263:9,11 270:4,25 271:25 272:3	<b>gun</b> 45:13 123:2	<b>handful</b> 231:2	
<b>grams</b> 268:11 270:18 271:6	<b>guy</b> 116:3 142:2	<b>handing</b> 15:10 143:15 204:18 206:10 239:14 279:18	
<b>graphs</b> 123:12	<b>guys</b> 106:3 120:22 136:18 142:2 170:22 171:13	<b>handle</b> 167:21 171:14	
<b>grasp</b> 111:11	<b>h</b>	<b>handled</b> 16:13 25:7	
<b>grass</b> 184:22	<b>h</b> 204:16	<b>handler</b> 11:23 12:20 28:20 29:1 34:16 38:16 40:6 45:9,20 46:5	
<b>great</b> 4:21 5:1 6:20,24 7:8 18:5 65:18 70:15 97:8 128:18 135:1 147:12 153:14 161:16 247:20 257:5	<b>habit</b> 51:25 103:21 104:7 128:3 131:4		
<b>green</b> 16:14			
<b>greenhill</b> 2:15			
<b>ground</b> 45:12 53:24 90:16 160:11,15 219:3			
<b>grounds</b> 110:3			
<b>group</b> 80:19 131:13 209:3			
<b>grow</b> 44:17			



**[handler - hemp]**

Page 31

168:2 169:24 170:3 172:7 175:12 176:1,2 176:5,5,8,11,17 182:23 183:9 185:18 191:13 191:13 194:24 199:15,24 201:7,10 <b>handler's</b> 88:10 109:11 111:23 112:24 152:16 168:3 <b>handlers</b> 36:25 37:7 42:8 49:17 56:23 59:8 70:16 99:4 102:24 106:8 112:12 117:25 118:6 126:20 132:7 133:4 135:10 137:4 138:5 150:13,25 153:11 171:8 192:23 <b>handling</b> 33:1 40:2,7 41:20 81:8 126:20 150:10,24 154:7,7 155:12 280:17,17 <b>hang</b> 217:9	<b>hans</b> 53:2,8,17 53:20 174:17 174:19,20 177:14 <b>happen</b> 93:9 104:11 106:25 141:7 149:5 166:5 189:12 189:17 204:9 237:25 245:15 <b>happened</b> 13:14,16 55:16 57:4 121:21 156:23 172:17 172:21 203:10 221:15,16 250:10 <b>happening</b> 55:17 59:18 104:14 122:25 130:7 159:4 172:14 186:18 190:21 203:12 203:13,17 <b>happens</b> 96:4 148:11 159:22 <b>happy</b> 143:25 147:2 174:2,2 178:8 189:3 248:11 249:7 251:15 269:19 274:10 <b>hard</b> 6:10 33:8 71:6 104:3	129:7 184:17 190:18 238:7 <b>hat</b> 54:7,9 <b>hats</b> 53:24 <b>head</b> 10:7 45:20,20 47:14 48:18 54:8 77:11,12 101:21 195:12 202:12 204:8 221:15 224:17 243:22 <b>headache</b> 174:15 <b>heading</b> 16:7 23:1 <b>headings</b> 22:1 <b>heard</b> 172:14 <b>hearing</b> 14:2 <b>heartburn</b> 223:5 227:11 263:17 <b>heavily</b> 215:15 <b>hebert</b> 2:9 4:12 35:4,9 114:9 114:13 204:20 204:22,25 235:3 275:19 <b>hectic</b> 174:16 <b>hector</b> 2:20 4:15 <b>heel</b> 111:6 <b>held</b> 35:19	<b>help</b> 11:22 12:17 15:8 39:19 86:4 109:15 111:10 140:19 155:16 159:17 167:9 167:11 174:9 175:2,6 <b>helpful</b> 43:7 44:12 56:2 59:3 60:12 61:21 64:21 86:11 88:14 107:17 112:7 114:1 130:8,10 152:24 <b>helping</b> 93:22 274:20 <b>hemp</b> 78:13,20 94:3,7,11,24 95:16,19 96:11 96:23,25 97:1 97:3,4,21 98:1 98:1,6 211:1 211:16,18 214:5 215:9 217:1 218:11 219:25 220:20 222:22 223:15 227:15 228:5 228:17 229:10 229:24 230:11 230:22 231:14 232:3,16 234:4
--	---	---	---

[hemp - identify]

Page 32

234:21 236:2 <b>hereto</b> 1:25 <b>heroin</b> 88:6 <b>hesitance</b> 278:10 <b>hesitant</b> 71:5 <b>hey</b> 15:3 63:1 111:4 114:2 131:10 214:16 <b>hid</b> 12:16 <b>hide</b> 167:25 <b>hiding</b> 168:1,7 168:20 169:12 170:25 248:8 <b>hierarchy</b> 114:22 <b>high</b> 12:16 131:10,11 137:10,11 198:20 <b>higher</b> 65:6 100:15 189:11 <b>highest</b> 200:7 <b>highly</b> 48:7 201:17 <b>highway</b> 166:3 184:16 <b>hinge</b> 61:4 <b>history</b> 52:3,6 52:11 83:19 101:13 203:5 <b>hit</b> 61:14 105:5 125:9 140:4 192:8	<b>hits</b> 151:6,7 192:7 <b>hitting</b> 140:5 140:13 <b>hold</b> 38:24 114:14 160:11 171:13,14 185:23 221:17 226:24 233:3 285:10 <b>hole</b> 94:22 <b>home</b> 196:2 <b>honest</b> 122:15 171:22 <b>honestly</b> 16:19 146:11 190:14 221:13 250:8 <b>hope</b> 103:23 143:11 <b>hoped</b> 214:23 <b>hoping</b> 191:7 <b>horrible</b> 174:14 <b>horse</b> 53:8,21 53:22 <b>hour</b> 105:21 114:5 220:6 237:5,8 <b>hours</b> 9:20,22 9:24 10:5,12 38:9 100:13,13 105:2,6,7,9,13 105:18 106:9 107:22 202:15 205:8,13,15	207:10 209:9 209:14 213:15 215:1 216:17 216:18,21 218:3 219:16 222:14 223:9 227:6,23 228:10,10,24 229:18 230:5 230:16 231:3 231:22 232:10 233:22 234:14 235:13,14,16 236:12,23 237:4,6 238:6 <b>house</b> 100:22 165:2 <b>hovering</b> 47:8 94:18 160:15 <b>how's</b> 263:11 <b>huge</b> 269:23 <b>huh</b> 29:10 59:7 61:1 63:25 75:14 81:3 100:11 121:22 204:24 246:14 <b>human</b> 39:24 75:16 85:23 107:7 118:19 151:24 155:24 177:5,8 215:15 223:22,25 224:1	<b>humans</b> 90:12 224:1 <b>hundreds</b> 92:12 <b>hunt</b> 87:10 109:21,25 <b>hunter</b> 109:19 168:13 <b>hunting</b> 107:8 110:3,4,5 168:10 <b>hyper</b> 134:16 <b>hypothetical</b> 47:19 88:25 127:25
			<b>i</b>
			<b>idea</b> 10:4 64:12 84:25 89:12 97:18 145:20 148:3 154:16 219:7 245:9 246:10 261:3 282:21 <b>ideal</b> 91:12 <b>ideas</b> 75:10 95:23 163:19 <b>identified</b> 128:25 201:6 <b>identifies</b> 55:7 79:17 <b>identify</b> 127:4 139:11 140:25 196:14

## [identifying - indication]

Page 33

<b>identifying</b> 60:21 189:14	137:25 138:5,7 139:7 140:14	115:24	55:25 63:20,21
<b>identity</b> 287:11	162:4 167:14	<b>included</b> 26:12	66:11 80:16,17
<b>ifs</b> 104:3	174:6 175:14	26:13 149:2	80:20,23,24
<b>iii</b> 1:6 2:19 78:6	179:7 181:18	212:1	81:18 82:5,9
94:20 288:6	182:22 203:5,9	<b>includes</b> 197:2	82:21 89:21
<b>ij.org</b> 2:6,7,12	<b>importantly</b>	<b>including</b>	90:2 129:13
<b>illegal</b> 40:22	7:4	193:25	132:12 133:2,3
76:6 77:2 79:9	<b>impossible</b>	<b>incomplete</b>	133:6,11,15
79:12 95:4,7	199:19,21	271:24 278:14	141:3,5 147:10
95:16 131:5	<b>improve</b> 42:20	<b>incorrect</b>	147:24 148:1
165:9 246:2	278:20	131:14	149:18,20,25
261:13,15	<b>improved</b>	<b>independently</b>	159:23 160:16
<b>imagine</b> 139:16	71:14	111:19 175:7	162:12 165:20
<b>imagining</b>	<b>improvement</b>	<b>index</b> 3:1	166:8 174:5,6
24:21	43:3,14,15	<b>indicate</b> 46:5	174:7,22 175:9
<b>immediate</b> 44:9	71:12	49:11 81:10	175:17 176:1
159:6	<b>improvements</b>	82:23 91:25	199:18 200:4,8
<b>immediately</b>	71:9	96:24 97:2,25	200:13,18,19
44:8 57:8	<b>incident</b> 13:1	177:4 193:20	201:6 210:25
133:23 204:6	17:23 18:2	199:21 241:8	211:17 241:6
<b>impairing</b> 7:10	24:22 25:1	276:5,6,17	242:24 243:3,8
<b>impending</b>	26:4,11,22	<b>indicated</b> 97:3	244:24 249:21
148:22	27:6,8,14	165:6 199:24	249:22,24
<b>implication</b>	178:13 203:14	211:4 276:2	250:2,13,17
245:24	203:17 204:6	<b>indicates</b> 126:2	251:21,22
<b>implied</b> 245:17	204:12 205:22	153:2 212:7	253:4,18 254:7
245:18	205:22 212:17	240:21	254:21 255:22
<b>important</b> 36:3	249:2 260:9	<b>indicating</b>	256:8,16
83:20 87:5	267:2 273:12	62:15 69:16	257:24 258:9
96:1,10 117:16	279:8	89:6 91:7 92:3	258:21 259:6
119:6,9 120:10	<b>incidents</b> 277:7	93:17 95:19	259:18 260:2
120:15 121:18	<b>include</b> 34:22	<b>indication</b>	260:14,22
121:19 132:25	45:6 73:17,20	11:19 49:24	262:8,15 263:4
		51:11 55:10,24	263:24 264:3,4

[indication - interfere]

Page 34

264:6,10,16	<b>industrywide</b>	<b>initiated</b> 23:13	<b>instrument</b>
265:2,10,16	120:7 131:7	175:16	287:13
266:2,11 267:2	<b>infallible</b> 201:1	<b>initiates</b> 174:22	<b>integration</b>
267:10,18,25	<b>influence</b>	<b>initiating</b> 126:8	37:2
268:7,19 269:2	151:22	<b>initiation</b> 174:5	<b>intend</b> 18:11
269:9 270:8,14	<b>informal</b>	<b>innately</b> 80:5,6	280:24 281:17
271:11,18	180:10,12	80:13	<b>intended</b> 157:4
272:13,23	181:7	<b>inner</b> 118:8	<b>intensity</b>
273:5,14	<b>information</b>	<b>input</b> 47:11	165:22
276:17	7:14,18,19,23	<b>inputs</b> 48:4	<b>intent</b> 18:14
<b>indications</b>	9:13 18:12,22	<b>inside</b> 68:21,25	<b>intention</b>
79:13,15	18:24 19:5,14	<b>inspected</b>	282:13
130:14 275:16	21:6,17,24	101:23 102:8	<b>intentional</b>
275:16 276:20	26:17 32:8	<b>inspection</b>	50:3,5,17
<b>indicative</b>	52:5 135:12,14	101:24 102:2,3	51:14 52:23
147:18,21	138:1 167:13	159:5 170:23	54:11 102:23
<b>individual</b> 1:5	175:1 176:6,12	<b>inspects</b> 157:4	103:10
1:7,8 23:5 50:7	176:17 181:3	<b>instance</b> 1:17	<b>interact</b> 144:21
51:19 68:9	274:14 279:14	180:12	<b>interaction</b>
72:23 106:4	280:3 282:1,25	<b>instances</b>	145:23
144:1,1 162:4	283:11 284:1,5	277:12	<b>interdiction</b>
165:3 288:5,7	284:8,12	<b>instantly</b>	113:15 280:22
288:8	<b>informational</b>	155:20	280:25
<b>inducing</b> 148:7	72:20	<b>instinct</b> 250:11	<b>interest</b> 50:21
<b>industry</b> 40:7	<b>informed</b> 284:2	250:14	118:10
41:19 54:20	<b>inherited</b> 121:6	<b>institute</b> 2:4,9	<b>interested</b>
94:17 105:1	<b>initial</b> 108:25	<b>instruct</b> 41:11	45:15 94:22
107:22 120:9	109:10 110:8	<b>instructed</b> 7:1	106:24 132:8
120:21 122:16	121:8	<b>instruction</b>	199:8 289:16
132:18 155:15	<b>initially</b> 29:21	134:13	<b>interesting</b>
162:17 163:16	83:23 132:22	<b>instructor</b> 33:1	61:7 157:15
163:16 177:15	163:5	38:17 41:10	191:9
195:13	<b>initiate</b> 60:1	<b>instructors</b>	<b>interfere</b>
	157:6	131:9	175:19

[intermittent - k9]

Page 35

<b>intermittent</b> 163:11,11	<b>involve</b> 119:17 127:8	286:3 288:12 289:18 290:4 291:3	<b>jumps</b> 182:1
<b>internal</b> 27:19 27:25 28:3	<b>involved</b> 13:19 71:19 136:14	<b>javier</b> 1:7 288:7	<b>justice</b> 2:4,9
<b>international</b> 94:9	138:24 167:22 199:10 273:12	<b>jeopardy</b> 69:23	<b>justified</b> 19:15
<b>interstate</b> 129:25	<b>involvement</b> 168:4	<b>jewelry</b> 165:4	<b>justify</b> 283:12
<b>intervene</b> 87:23	<b>involves</b> 22:22 209:4	<b>jfox</b> 2:7	<b>k</b>
<b>interview</b> 243:18	<b>involving</b> 14:9 17:23 18:3	<b>job</b> 5:2,3 38:11 42:20,21,23 43:25 56:8 65:10 66:4 96:7 117:13 120:13 134:16 140:14 187:20 215:13	<b>k9</b> 3:12,14 8:14 8:19 9:7 11:11 11:18,22 12:2 12:23 13:19,22 18:18 19:7,10 20:15 24:8 25:6 28:23 32:25 34:15 37:1,8,22,24 38:13,13,16,21 38:24 39:5,10 40:2,6,7,14 41:17,20 42:7 42:11 43:21 47:20 54:2,20 70:16 71:18 72:15 81:8 84:20 88:4,5 95:18 106:7 107:20 114:22 115:4,9,16,18 116:11,17 117:7,8,11 118:2,4,9,17,23 120:5 121:9 124:25 125:2 126:5,7,11 127:21 128:1
<b>interviewing</b> 128:8	<b>irrelevant</b> 84:13 96:3	<b>jobs</b> 35:19	
<b>intrinsic</b> 86:14 132:1	<b>issue</b> 64:4,7 65:3 82:18 118:16 136:22 136:25 140:15	<b>joel</b> 1:5 2:14 288:5 291:4	
<b>intrinsically</b> 80:7,13	<b>issues</b> 4:22 16:11 141:1	<b>jog</b> 213:25	
<b>introduce</b> 14:24 279:16	<b>item</b> 22:2,25 23:2,5,7 82:25 83:8 250:21	<b>joined</b> 4:11	
<b>introduced</b> 30:5	<b>items</b> 21:20,23 23:2 26:1,1 225:15	<b>josh</b> 4:7,12 114:2 178:2 204:17 247:23 274:21	
<b>introducing</b> 177:25		<b>joshua</b> 2:3,3	
<b>introduction</b> 73:18		<b>judge</b> 39:20	
<b>invading</b> 49:6		<b>judgment</b> 96:12	
<b>inventory</b> 130:5	<b>j</b>	<b>july</b> 10:25 11:1 11:14 212:18 212:25 213:13	
<b>invested</b> 224:22	<b>jail</b> 115:24	<b>jump</b> 45:13	
<b>investigate</b> 281:16	<b>jails</b> 76:20,23	<b>jumping</b> 52:14	
<b>investigation</b> 134:9	<b>january</b> 1:14 1:19 230:3,4 230:15 266:2		

[k9 - know]

Page 36

128:18,20	288:17 291:5	140:25 144:18	51:4,4,6 52:15
130:11 131:2	<b>kick</b> 5:1 143:12	145:14,16	56:5 57:1,12
132:10,19	<b>kid</b> 11:25	148:24 149:3	59:8 64:8,24
135:3 136:23	<b>kilos</b> 164:20	150:9 151:11	65:18 67:20
137:14,21	265:19 269:24	152:25 153:8	70:2 72:22
138:18 139:11	<b>kind</b> 5:20 7:6	154:18 155:20	75:9 77:9
139:17 140:24	10:4 13:3	162:22 169:6	79:21 80:4
141:24 142:9	15:20 17:1,21	171:4 174:15	81:2,4 83:18
142:19 179:18	20:8 21:12	176:25 178:16	83:19 84:4,7
208:19 226:7	23:7 28:24	182:9 183:16	85:23 90:12
226:11 240:2	31:22 32:13	184:12,13,14	93:16 95:23
240:12,21	36:14 37:25	185:21 186:1	96:20 97:1,5
248:22 261:12	44:1 45:12	188:23 192:14	97:10,11,22,25
278:4 280:16	47:11 49:2	194:14,22	98:10,13 99:11
280:17,19	51:8 56:18	195:12 196:12	99:13 102:20
281:20	61:6 63:15	201:19 202:10	105:14,19,25
<b>k9s</b> 58:8	64:4 65:2 66:8	207:4,17	106:21 112:4
<b>keep</b> 10:1 15:6	66:10,10 70:24	208:15 213:25	112:11 113:15
57:3 119:19	71:15 74:20	223:23 238:20	113:19 114:23
121:24 122:12	75:1,5,7,8 79:9	241:6 242:20	115:2,22
131:22 132:11	79:19 80:9	249:19 256:22	116:14 117:17
156:13 173:20	86:7,20 90:10	282:25	118:6,7,8,12,17
184:17 185:2	92:5,9 94:22	<b>kinds</b> 44:16,16	119:2,6,7,9,20
196:11 234:13	96:9 97:7,22	53:10,11 75:20	119:25,25
238:6	99:1 109:15	140:23 176:10	120:1,3,5,9
<b>keeping</b> 135:20	114:22 115:3	195:1	121:5,14
185:8	116:6 117:10	<b>knew</b> 51:22	122:12,25
<b>keeps</b> 84:23	119:15,24	<b>know</b> 5:6,12	124:7 125:19
175:21	121:7 122:18	6:10,21 7:4	127:11,16
<b>kevin</b> 1:13,16	123:12,18,24	10:6 12:6 15:7	129:10,23
3:4 4:1 5:3,8	124:12 126:11	15:13 16:10	130:2,23
5:10 41:24	128:24 130:22	24:13 31:7	132:17 135:20
286:2 287:1,4	137:22,23	33:6 36:15	135:22 136:17
287:9 288:12	138:10,22	37:19 50:11,12	136:25,25



**[know - left]**

Page 37

137:2,17 139:3 139:16 140:9 142:25 145:14 147:1,4 148:4 151:7 154:19 157:9,10,18 158:15,16 160:21 161:23 162:3 163:8 164:23 166:14 167:4 169:5,7 169:11,21 171:10 172:16 176:8 180:13 181:4 184:7 185:3,7,10,18 187:6 190:15 191:4,6,8,9 192:6 194:18 195:11 199:9 200:24,24 203:4,5 204:4 204:9 205:3 206:14 210:22 212:10,21 213:3 214:10 216:15 217:14 217:25 221:4 224:10,16,17 225:25 226:3,6 226:8 228:22 233:13 236:13 238:5,14 239:16,20	243:8,11 244:7 246:6,8,16 252:22 255:11 257:14,19 260:25 261:21 264:13 269:17 271:3 277:5,6 277:14 278:14 278:16,18,20 279:1,1 283:3 283:5,8 <b>knowing</b> 49:17 49:20 50:5 56:23 117:24 246:2 <b>knowledge</b> 36:7 74:16 96:15 <b>knowledgeable</b> 40:6,10 79:3 <b>known</b> 162:13 162:14 164:8,9 166:9 176:10 287:9 <b>knows</b> 58:19,21 111:4,5,8 113:13 158:3 180:13 181:11 <b>kong</b> 57:12,12 57:23 58:3,5 58:13,15 59:10 89:2,8,12,13,20 90:2 110:19 130:24,24	133:23 197:15 197:16 <b>kongs</b> 58:1 <b>l</b> <b>lab</b> 252:15,18 <b>label</b> 247:23 <b>labeled</b> 216:8 <b>lacking</b> 225:17 <b>language</b> 111:12 138:4 243:7 <b>laptop</b> 273:22 274:12 <b>large</b> 139:13 269:23 <b>larger</b> 48:10 182:19 <b>largest</b> 142:6 <b>latest</b> 202:25 <b>latex</b> 224:6,7 <b>law</b> 1:21 2:21 5:7 34:21 36:23 37:25 38:18 76:11,13 77:16 117:17 235:6 281:8 <b>lawsuit</b> 4:8 12:4 13:3 23:13 <b>lawyers</b> 120:24 <b>lay</b> 81:2 <b>layer</b> 159:6,6,6 159:7	<b>leads</b> 200:16 <b>leaf</b> 78:25 94:6 <b>leaps</b> 138:7 <b>learn</b> 75:1 85:2 85:4 149:2 224:5 283:18 283:22 <b>learned</b> 58:24 83:16 94:12 162:25 237:21 283:11 <b>learning</b> 95:21 147:12 <b>learns</b> 54:9 86:2 89:20 <b>leash</b> 48:12 111:18 151:7 157:5,14 179:20 183:23 183:25 184:9 192:7,8 193:2 <b>leave</b> 81:18 154:13 155:9 182:6 193:1 283:7 <b>leaving</b> 272:21 <b>leerburg</b> 72:6,9 72:14,18,19 73:6,9,10,13,24 74:15 81:14 142:16,25 143:24 144:14 <b>left</b> 209:18
---	--	--	--

[legal - look]

Page 38

<b>legal</b> 76:9 78:1 78:9,14 79:10 95:17 211:1 289:23 290:17 291:23	<b>lingo</b> 66:9 242:21 276:3	121:11 122:2 127:8 134:15 139:4,15 150:19 151:25 152:12 155:14 156:2 163:4 164:10 167:12 168:4 174:16 184:17 185:22 187:24 189:10 194:4 197:6,8 201:20 207:3 214:10 234:25 236:10 237:21 238:10,23 246:11 248:12 250:6,24 278:14,16,17	<b>log</b> 24:24 <b>logging</b> 279:23 <b>logs</b> 24:12,16 24:20,21 26:13 <b>long</b> 9:15 10:10 112:15 115:3 119:14 123:2 125:13 145:14 146:16,16 159:13
<b>legalization</b> 78:8	<b>list</b> 21:14,20 22:5,6,7,9 23:1 23:8 26:7 34:3 34:19 85:10 255:12	<b>listed</b> 7:23 22:25 32:4 33:18 34:2 35:21,25 36:5 36:6,7 93:1 219:24 227:8 227:10,13	<b>longer</b> 28:18 98:16 167:4
<b>legalized</b> 77:14			<b>look</b> 14:23 15:12 23:4,24 29:12 30:6,11 45:21 49:21 50:6 51:21 56:22 68:9 71:6,15 100:21 106:20 119:20 119:24 120:3 120:18,25 121:2 122:5 126:8 127:5,16 129:4,24 134:1 138:14 139:2 139:19 141:2 141:10,19 143:18,25 146:21 160:13 168:12 172:1 174:4 175:20 177:3 183:6,8 183:10 191:10
<b>lens</b> 51:5			
<b>lessons</b> 54:1			
<b>level</b> 85:2 101:16 110:16			
<b>levels</b> 79:1			
<b>lie</b> 198:19 199:11,14			
<b>lieutenant</b> 115:20			
<b>lifting</b> 158:24	<b>listening</b> 181:5 181:5	<b>live</b> 129:8	
<b>liked</b> 165:3	<b>lists</b> 232:21	<b>living</b> 40:17	
<b>likelihood</b> 131:16	<b>literally</b> 164:19 199:14	<b>locate</b> 46:5 79:18 83:7 198:21	
<b>likely</b> 52:2,12 52:18 153:22	<b>little</b> 7:19 11:13 11:19 15:21 16:5 21:11 26:19 32:12 36:15 39:13 46:22 63:23 69:18 75:11 83:5 90:15 92:15 94:1 100:25 106:5 107:2,18 113:21 114:21	<b>located</b> 81:1 <b>locates</b> 174:21 <b>location</b> 112:3 112:9 195:17 224:15 279:13	
<b>likes</b> 87:17 251:20		<b>locations</b> 224:16	
<b>limited</b> 14:17 149:1		<b>lock</b> 79:20 80:14	
<b>line</b> 21:4 130:20 167:24 169:11 184:13 286:4		<b>lockers</b> 151:5 215:15	
<b>lines</b> 166:25 167:6			

**[look - maintenance]**

Page 39

192:3 202:17 203:16 205:3 206:12,16 211:23 218:20 219:2 221:11 222:2 226:13 239:17 240:15 244:9 251:20 254:10 255:9 256:2 262:4 274:12 275:16 281:20 <b>looked</b> 18:24 27:1 29:2 30:10 44:15 46:4 84:8 124:1,12,16,18 126:9 134:3 141:16,16 175:11,17,25 202:25 203:3 203:18,19,21 206:25 <b>looking</b> 27:18 41:2 50:17 57:19 63:18 69:25 105:25 106:23 113:16 121:20 134:11 136:15 139:17 151:5 155:9,23 157:17,18 168:2 175:4,5 175:9 177:13	181:25 185:17 191:1 196:7 198:24 201:16 201:18 203:4 204:7 215:14 216:9 219:7 224:25 227:1 238:7 251:14 275:3 <b>looks</b> 18:6 21:3 26:13 44:23 56:18 97:23 122:14 143:7 143:23 174:22 181:23 187:13 188:2,5 191:25 193:12 202:18 205:25 208:18 208:25 209:17 210:6,13,17 212:5 213:14 213:18,21 216:12,17 217:3,5,7 218:6,15 220:6 220:7,8 221:24 222:4,14,16,19 222:24 223:18 226:22 227:22 227:25 228:10 228:12 229:8 230:16 231:5 231:16 233:4 234:13 235:12	235:14,19 236:6 237:2,3 237:6,11,14 240:16,20 242:3,19,21 244:21 249:20 251:8 252:6 253:1,6,9,19,22 254:1,10 255:21 259:13 263:1 264:18 265:1 268:9 272:12 274:22 275:1 276:8 277:11,19 <b>lose</b> 48:20 166:7 <b>losing</b> 166:15 <b>lost</b> 56:13 120:21 <b>lot</b> 20:7 21:12 28:14 32:14 33:3 66:20,20 75:25,25 83:25 94:14 111:3 116:1,20 130:13 135:16 136:17 172:17 172:20 173:12 183:10 189:17 204:3 211:25 <b>lots</b> 140:10 <b>loud</b> 16:10	<b>loves</b> 57:11 58:1 <b>lower</b> 46:8 65:7 201:23,25 <b>lumped</b> 29:14 <b>lunch</b> 114:6,7 114:15 130:20 134:18,20,23 <b>lying</b> 132:2 200:16 <b>m</b> <b>m</b> 2:9 <b>m4</b> 123:3 <b>machine</b> 1:21 <b>made</b> 9:14 117:23 125:4,5 173:15 220:13 225:15 279:3,5 287:24 290:8 <b>magazine</b> 233:2 <b>maintain</b> 123:4 185:4 <b>maintaining</b> 135:22 <b>maintains</b> 101:13,15 <b>maintenance</b> 36:25 37:7 43:9 100:7,8 100:18 103:24 104:21,24 105:2,17 106:9
---	--	---	---

[maintenance - max]

Page 40

106:14,25	208:6,8,24	<b>manner</b> 121:20	178:1 204:17
108:3,9 120:19	209:15 219:1	123:19 160:10	204:23 205:2
121:14 129:22	224:21 233:15	163:23	206:11 239:10
<b>major</b> 49:16	239:8 242:6	<b>manpower</b>	239:13,15
<b>majority</b> 176:7	248:5,9 264:11	116:6 125:14	248:19 264:9
<b>make</b> 4:18 6:4	264:13 276:9	<b>map</b> 169:7	279:20
14:7 20:6	284:14,17	<b>march</b> 18:2	<b>marker</b> 174:4
33:21 34:7	<b>makes</b> 6:8,22	205:22 206:2	<b>marking</b>
47:5,20 49:23	8:10 48:7	206:17 207:19	202:17
52:18 53:17	52:11 68:4	234:9,11 240:3	<b>martin</b> 1:6 2:19
55:12,19 57:15	107:1 111:3	240:8 249:2,16	205:7 217:24
58:6 67:7	115:5 118:9	249:17 272:22	288:6
68:10 86:16	122:22 126:12	273:4,11	<b>material</b>
89:3 91:19,24	146:3 161:17	<b>maria</b> 16:13	239:12
95:11,12,18	181:23 207:12	<b>marijuana</b>	<b>materials</b> 25:21
96:12 98:5	<b>making</b> 87:12	77:14,16,18	74:5 136:4
101:22 102:8	91:7 122:9	78:9,20 88:5	<b>math</b> 53:10
102:11,24	135:11 223:3	94:2,11 95:4,9	61:20 234:25
104:4,6 106:6	290:10	95:15,15 96:24	235:6 236:11
107:17 109:10	<b>maltose</b> 90:24	98:2,7,16	237:4 274:19
110:24 115:6	91:1	164:15 198:9	276:9
117:15 121:1	<b>man</b> 128:2	262:18 263:11	<b>matter</b> 4:21 5:6
122:10,22	<b>managed</b> 115:5	270:16 273:16	103:21 104:7
123:12 129:21	<b>managing</b>	<b>mark</b> 148:13	106:25 109:4
130:2,6 135:2	109:24	148:21 248:14	110:14 114:22
135:9,14	<b>manipulate</b>	248:15 250:9	123:6 154:21
141:20 153:20	46:6,7 167:20	250:10,12,14	261:12 283:19
153:21 154:12	201:10	254:8 257:16	<b>matters</b> 12:24
159:25 162:22	<b>manipulates</b>	257:18 261:5,6	19:5 40:11
164:13 173:14	58:15	261:7 263:16	123:7 198:15
175:7,24 177:1	<b>manipulating</b>	263:18 277:5	198:16
185:7 189:16	109:12	<b>marked</b> 3:18	<b>max</b> 9:7 19:8
192:25 194:11	<b>manipulation</b>	14:24 15:2,11	19:11 20:10,15
199:20 202:23	48:13	143:14,16	25:6 28:23

[max - minute]

Page 41

29:1 71:18	90:8 92:4	<b>measurable</b>	<b>methodologies</b>
83:18 84:2	93:10 97:4	256:6	83:4
88:5 101:4	102:4,22	<b>measured</b>	<b>methodology</b>
107:20 132:20	107:17 114:25	271:24	82:24 91:12
133:12,20,21	120:24 121:24	<b>medical</b> 95:9	<b>metro</b> 125:12
133:22 179:18	123:20 124:3	<b>medication</b>	<b>mexico</b> 11:21
179:20 181:19	130:8 132:19	7:10	14:1,5 78:11
181:20,25	136:10 138:10	<b>meeting</b> 141:14	94:25 95:1,2,4
182:13,14	148:15 149:7	<b>memory</b> 213:25	196:1
183:3 184:13	150:11,23	<b>mental</b> 47:1	<b>midatlantic</b>
184:21,25	157:1 158:22	<b>mention</b> 92:24	291:15
185:10 187:1,6	159:24 160:23	<b>mentioned</b> 8:3	<b>middle</b> 105:5
187:12,14,17	162:1,15 164:9	10:9,20 11:9	<b>military</b> 121:7
188:1,8 190:3	167:8,10	13:12 21:18	121:9,10
190:7 191:1,4	171:18 173:10	27:16 32:9	<b>milk</b> 90:24 91:1
191:9,24,25	176:25 177:20	45:16,17 50:18	91:4
194:14,17,19	181:2 186:5	51:3 52:21	<b>mind</b> 17:7
195:8 197:10	189:4 198:18	59:4 70:23	18:17 22:16
197:16 201:13	200:2 210:23	74:19 94:3	44:13 45:18
206:1,6 209:25	218:24,24	100:25 106:11	50:18 60:6
275:11 276:12	223:22 242:3	122:8 125:23	61:15 92:5
276:17	269:23,25	127:20 158:12	94:5 100:21
<b>max's</b> 18:18	270:2	168:19 177:17	274:20
179:20 184:15	<b>means</b> 22:6,16	178:19 285:9	<b>mine</b> 144:11
202:24 204:10	22:18 24:13	<b>mentions</b> 49:10	157:1 173:11
205:12 206:7	121:21 150:15	<b>mess</b> 104:4,8	244:18
238:19	153:5 159:1	191:13	<b>minimum</b>
<b>mean</b> 24:19	160:23 174:10	<b>met</b> 4:7	65:13,16 117:8
33:19 34:5	217:12,14	<b>meth</b> 88:5	<b>minimums</b>
36:16 38:6	261:1,3 276:18	265:19	100:14
40:1,20 54:23	<b>meant</b> 17:8	<b>methampheta...</b>	<b>minute</b> 143:18
57:11,14 76:20	40:15 67:8	272:5	143:20 146:7
76:25 83:1	119:8 214:22	<b>method</b> 250:23	146:10
84:14 88:1		265:9	

[minutes - moving]

Page 42

<b>minutes</b> 9:18 114:15 209:9 223:9	162:10 166:23 166:24 167:1 172:23,25	238:18 240:3 240:13 241:3 243:12,22	<b>months</b> 34:17 34:18 124:5,9 124:12,17
<b>misdemeanor</b> 261:24	173:2,4	277:12,14 288:6	202:18,21 204:6,12
<b>misdemeanors</b> 261:23	<b>modules</b> 144:1 169:2	<b>molina's</b> 4:14 8:23 17:25	236:11
<b>misleading</b> 276:10	<b>mold</b> 75:18	28:20 57:6 101:4 106:21	<b>moot</b> 94:19
<b>missed</b> 62:19 69:22 70:6 181:18 186:14	<b>molina</b> 1:6 2:19 3:14 9:7 18:17 19:7,10 20:10 20:15,22,25 25:7 26:14 27:10 28:7,25 29:19,23 30:6 30:20 31:4,20 40:11 55:11,21 60:24 71:18 127:20,23 132:23 133:21 133:22 179:17 179:19 180:16 181:19,21,23 181:25 182:2 184:14 185:10 188:8 191:25 193:12,20,22 194:14,16 196:18,21,25 197:20,22 198:14 205:7 205:20 206:1 208:5,19,19 209:24 217:24 235:15 236:24	123:13 127:12 132:15 178:12 190:4,7 192:14 195:12 206:6 212:17 241:5 242:21 248:21 276:3 278:4	<b>morning</b> 4:5,6 178:9,10,20,22 179:1
<b>misses</b> 44:7 45:16 61:8,10 62:25 64:25 68:6		191:24 206:11	<b>motion</b> 51:7,13 52:13 159:19
<b>missing</b> 25:25 26:8 62:14,17 62:18 63:2,5,7 63:9 83:18 134:6 213:10		<b>moment</b> 15:12 45:21 143:5 154:4 167:17 185:11 191:3	<b>motivation</b> 78:4 166:7 201:10
<b>misspelled</b> 269:24		191:24 206:11	<b>mouth</b> 140:18 197:13 212:14
<b>mistake</b> 55:14 153:11		<b>moments</b> 71:4	<b>move</b> 32:3 53:24 121:25 138:13 151:21 153:4,10,20,21 160:12 166:23 193:4 197:6 220:4 242:11 251:16,18
<b>mistakes</b> 102:24 162:22 225:14		<b>money</b> 92:16	<b>moved</b> 125:20
<b>misunderstan...</b> 183:18		<b>monitored</b> 104:19	<b>movement</b> 181:23,24 183:1,5 186:2
<b>mode</b> 160:22		<b>month</b> 39:25 123:5 137:16 206:5,16 207:18 232:8 235:16,20 236:18,24 238:16,18 241:24 248:22 275:10 277:25	<b>movements</b> 185:20
<b>module</b> 146:3,5 146:8,23 150:4 150:6 156:7,20			<b>moving</b> 57:4 169:1,2 173:20 192:19



**[mueller - neighborhoods]**

Page 43

<b>mueller</b> 2:15	92:8,16,20,21	266:14,18	<b>need</b> 7:5,5 15:3
<b>multiple</b> 26:12	95:18 97:20	267:5,20 268:2	15:8 47:8 52:5
82:10 131:7,9	99:14 106:15	268:9,22 269:5	55:1 87:6 89:7
219:21	106:17 107:1	269:12 270:10	117:17,22
<b>multipurpose</b>	107:12,21	270:16 271:14	118:18 121:4,5
107:16 113:22	108:9,14,22	271:21 272:15	125:16 127:15
155:16	109:1 111:5,20	272:25 273:7	136:19 138:14
<b>n</b>	112:1,5,13,17	276:8,20,25	138:23 139:3,4
<b>n</b> 2:1 37:18	117:16,22	281:10	141:10 144:2
<b>nail</b> 27:24	127:17 130:25	<b>narrative</b> 27:7	150:13 152:12
189:25	132:21 148:5	<b>narrow</b> 163:20	155:2 167:3
<b>name</b> 4:7 5:2	158:2,3,14	<b>national</b> 39:5	187:21 206:18
11:17 13:2	165:18 175:23	96:9	241:10 248:10
173:4 174:17	194:23 195:2	<b>nationally</b>	249:9,10
174:19 286:2	205:9 209:4	92:25	252:13 274:11
287:12	212:22,23,24	<b>nationwide</b>	283:9 284:12
<b>narcotic</b> 76:3	212:25 213:5	68:6 78:8,14	<b>needed</b> 44:5
89:2,7 165:9	213:10 214:21	99:1	85:4 124:7
218:10 233:3,4	218:15,21,22	<b>nature</b> 77:5	148:4 182:6
233:16 246:3	219:2 233:11	212:2	195:20 284:2
257:7	234:9 235:15	<b>navigate</b>	<b>needs</b> 41:24
<b>narcotics</b> 8:14	235:20 236:23	146:18,19	43:14 48:9
8:19 14:2,9	241:9 245:1	<b>ncats</b> 25:6,16	59:17 64:15
18:1 40:22	250:18 251:1,3	71:22,24 101:2	106:25 138:3
42:2,14 43:24	251:23 253:6	205:8 206:6	139:1 147:7
44:5,25 45:3,5	253:19 254:10	236:25 238:19	153:5 184:16
47:21 58:8	254:23 255:24	242:1	193:13 237:25
59:15 64:19	256:11,19	<b>near</b> 184:22	238:1,2 245:10
73:17,20 76:2	258:2,12,24	<b>necessarily</b>	<b>negative</b> 88:20
76:7,8,9 77:2,3	259:9,21 260:4	51:15 102:22	88:20 147:12
81:20 82:2,14	260:16 261:1	284:19	148:17,24
88:4,5,24	261:13,14,15	<b>necessary</b>	149:9 184:10
90:22 91:24	262:10 263:7	284:13	<b>neighborhoods</b>
	264:19 265:21		130:1

[neither - numerous]

Page 44

<b>neither</b> 192:2 289:12 <b>never</b> 41:5 93:9 93:12 104:11 131:15,18 136:14 143:9 150:19,24 162:19 199:14 200:6,22 245:11 279:3,5 <b>new</b> 11:4,21 14:1,5 78:11 78:15 94:12,24 95:1,2,4 162:18 173:9 196:1 240:18 283:11 <b>nice</b> 122:15 138:10 165:5 174:3 187:24 197:10 224:18 <b>nine</b> 229:1,5 231:11 275:18 275:18 276:23 277:6 <b>noblewood</b> 267:2 <b>non</b> 219:5,6,7 <b>nope</b> 151:9 <b>normal</b> 142:3 183:2 186:23 <b>normally</b> 58:17 261:19	<b>north</b> 2:4 46:1 <b>nose</b> 107:12,13 187:22 246:11 <b>notary</b> 287:20 288:15 289:5 <b>notation</b> 213:23 <b>note</b> 210:20 215:23 216:14 218:19 221:14 233:5,18 241:12 283:9 285:6 291:10 <b>noted</b> 212:8,11 212:15 214:5,7 215:9,11 217:1 217:4,6 218:22 219:20,23,25 220:2,20,22 221:25 222:4,5 222:10,19,22 222:25 223:13 223:14,15 225:14 227:15 227:25 228:3,4 228:5,7,12,15 228:16,17,19 228:20 229:1,5 229:8,10,12,20 229:22,24 230:1,7,9,11,13 230:18,20,22 230:24 231:17 232:5,16,18	233:19 234:4,6 234:21,23 236:7 237:13 237:14 242:22 242:24 244:22 244:24 245:4,5 245:16,19 249:20 251:4,4 251:20,22 253:4,4,7,20 255:4 258:4 264:19 276:17 276:20,22,25 277:8,16 287:3 <b>notes</b> 10:17 220:11 254:13 279:9 <b>notice</b> 4:23 233:5 <b>noticed</b> 211:24 <b>notified</b> 290:3 290:6 <b>noting</b> 215:13 215:17 <b>november</b> 12:9 144:9 <b>nowadays</b> 137:2 <b>npca</b> 39:12 68:10 <b>number</b> 3:10 3:19 28:11 31:23 38:24 39:13 42:18	48:22,24 53:23 65:3 68:18 70:1 103:16 136:12 141:9 142:6 185:22 201:17 216:9 217:25 235:13 235:14,19,23 237:4 242:4 248:13 276:13 276:21 279:11 279:11 <b>numbered</b> 1:18 <b>numbers</b> 47:3 48:10 54:21 122:10,22 123:18 139:18 139:18,19,20 139:25 141:16 201:20,22 204:7 207:23 208:17 212:24 221:8,20 237:17,19,20 238:11 243:23 244:5,15 246:12,18 248:6 249:19 <b>numerical</b> 238:21 <b>numerous</b> 72:5 72:12 281:11
--	--	--	--

[oath - okay]

Page 45

<b>o</b>	<b>observes</b> 131:3	153:12,16,17	128:8 145:19
<b>oath</b> 5:23 35:16	<b>observing</b>	153:21,24	281:4,9 288:18
70:13 74:11	53:18 134:4	154:1,12,14,20	290:6
128:16 134:24	138:6 141:21	155:5,7,7	<b>officers</b> 9:1
173:24 199:6	<b>obsessed</b> 57:12	174:21 175:2	27:8,13 118:8
247:18 285:2	<b>obtain</b> 66:1	182:21,22	243:19 261:14
287:10	284:12	184:5 185:13	<b>offices</b> 1:21
<b>obedience</b>	<b>obvious</b> 192:5	185:17 191:11	2:21
108:2,6,10,15	201:23,24	191:11,16	<b>official</b> 1:6,7,8
108:21 109:2	<b>obviously</b>	193:4 195:9	39:6 288:6,7,8
110:17 112:2,5	191:10 223:20	196:8 198:22	<b>oh</b> 9:19 13:10
112:14,16	224:22	200:5,25	36:20 57:13
113:2 158:6,8	<b>occasion</b> 43:20	215:15 223:25	63:10 64:18
159:18 160:4,7	224:4	224:1,6 246:7	68:18 72:10
160:12,17,23	<b>occasionally</b>	<b>odors</b> 61:12	78:7 108:4
161:10	163:10	82:23 85:3,10	136:12 143:9
<b>object</b> 6:24,25	<b>occur</b> 82:17	85:14,16	144:9 147:25
187:10	108:3	129:10 224:5	170:5 181:5
<b>objection</b> 103:1	<b>occurred</b> 253:1	<b>offer</b> 18:11,14	204:17 208:25
104:9 220:24	<b>occurs</b> 88:19	18:20 19:10	214:15,22
264:15	96:10	38:25 81:15	216:5 226:25
<b>observation</b>	<b>ochoa</b> 263:1	280:24 281:18	235:3,8 239:6
51:19 132:11	<b>october</b> 240:5,6	<b>offered</b> 18:7	240:6 256:25
<b>observe</b> 48:14	240:9	20:8 36:3,4	262:20 276:16
50:8,12 52:7	<b>odd</b> 153:4	244:3	283:8
52:16 70:24	<b>odor</b> 49:6,7	<b>offering</b> 19:4	<b>oil</b> 97:3
138:5 179:25	55:7 57:6	19:16 20:13	<b>okay</b> 4:17 5:9
<b>observed</b> 50:22	60:22 62:3	38:14,19	5:11,16,18,22
50:24 55:15	80:1,14,22	281:23	6:13,18,23 7:2
133:25 226:10	83:8 85:22	<b>office</b> 29:2	7:3,12,16,22
<b>observer</b> 172:1	109:10 129:11	142:8 145:24	8:3,7,16,18,22
172:4	129:12 149:21	287:17	8:25 9:4,9,15
	150:20 151:12	<b>officer</b> 11:21	9:20,22 10:13
	152:3,5,7,9,14	16:14 126:8	10:20 11:9,13

[okay - okay]

Page 46

11:17 12:2,6	43:12,17,25	86:11,15,21	128:23 129:6
12:10,19 13:7	44:3,12 45:4	87:2,8,22,24	129:18 130:4,8
13:9,11,15,18	45:10,24 46:9	88:9,14 89:5	131:1,2 132:25
14:16 15:7,20	46:18,21 47:4	89:12,16,19	133:7,11,18
16:19,22 17:10	47:11,19 48:1	90:7,11,14,19	134:8,14,17,19
17:12,19 18:2	48:11,24 49:9	91:2,6,14 93:7	135:8 136:20
18:5,10,16,20	49:13,23 50:5	93:13 94:1	137:13 138:17
19:4,9,19,20	50:23 51:11,17	95:22 96:5,16	141:6,18,23
20:5,13,24	52:5,20 53:4	97:6,9,17 98:4	142:5,15,23
21:2,17,23	54:4,10,19	98:12,25 99:3	143:2,17 144:6
22:3,9,15,25	55:23 56:2,12	99:11,17,22,25	144:10,20
23:6,15,19,23	56:25 57:2	102:2,7,19	145:2,5,8,13
24:3,7,12,19,23	58:1,8 59:3,20	103:19 104:1	146:1,4,8,13,23
25:3,10,15,18	60:3,9 61:6,14	104:12,18,21	146:24 147:23
25:24 26:3,10	62:2,7 63:10	104:24 105:4	148:10,16,23
26:19,25 27:3	63:15 64:21	105:16 106:6	149:3,10,13,17
27:5,20,24	65:6,9 66:8	106:11,19,24	150:4,5 151:3
28:3,6,12,15,19	67:12,24 68:1	107:3,10,14,24	151:18,23
28:22 29:13,18	68:24 69:7,9	108:1,8,17	152:4,8,11,20
29:22,25 30:4	69:15,19 70:8	109:5 110:7,13	152:24 153:9
30:9,12,17	70:11 71:23	110:21 111:13	153:25 154:5
31:2,5,10,15,22	72:1,10,18,25	111:25 112:7	155:3 156:10
32:3,12 33:2,7	73:4,13,15,20	112:15,24	156:11,13,16
33:23 34:12,18	73:23 74:5,13	113:9,18,20	156:18,22
34:25 35:12,18	74:18 75:1,5	114:1,11,19,20	157:8,12,21
35:23 36:2,13	76:11 77:5,9	115:12 116:8	158:1,8,20
36:18 37:5,11	77:25 78:7,13	116:22 117:2	159:22 160:2
37:20,24 38:4	78:20 79:5,7	117:20 120:12	161:19,24
38:10,23 39:7	79:19,23 80:3	120:20 122:8	162:10 164:2
39:9,18,22	80:8,12,16	123:9,18,24	164:12,16,22
40:1,5,10,13	81:8 82:4	124:15,20,25	166:6,19,23
41:8,13,16,22	83:12 84:7,10	125:7 126:10	167:3 168:11
42:2,10,13,19	84:14,18,25	126:14,23	168:19,21,21
42:22 43:2,4	85:8,25 86:8	127:3 128:18	168:22,22,23

[okay - online]

Page 47

168:25 169:25	203:2,16,24	235:18,23	276:8 277:10
170:16,21	204:2,9,25	236:6,10,17	277:14,19,20
171:3,4,7,16,24	205:16,19,25	237:11,23	277:24 278:2,3
172:3,6,14,23	206:5,9,13,21	238:9,13,23	278:24 279:12
173:2,6,7	206:25 207:2,5	239:2,18,19,23	280:5,8,13,21
174:15,23	207:16,20,21	240:1,8,17	280:24 281:17
175:10 176:4	208:2,3,12,14	241:8,11,12,19	281:22 282:9
176:23 177:8	208:15,21	241:22 242:2	282:12,16,19
177:22 178:5	209:12 210:2,6	242:15,19	282:25 283:5
178:12,15,25	210:10,12,20	243:13,18,21	283:10,15,18
179:3,11,15,24	210:23 211:5	244:14,21	283:25 284:10
180:3,8,16,19	211:11,13	245:13,22	284:16,23
180:23 181:1,8	212:3,6,9,14	246:5,17,19,24	285:13,14,17
181:13 182:13	213:4,5,8,12,18	247:4,9 248:17	<b>old</b> 12:17
183:12,19,23	214:15 215:19	248:24 249:6	101:18 122:6
184:4 185:20	215:22 216:2,5	249:11,14	188:15
185:25 186:11	216:9,13,17,20	250:1,5,8,17	<b>older</b> 98:20
187:9,16 188:7	217:17,21	251:3,5,19,22	<b>olg</b> 1:5 288:5
188:11,13,18	218:14,19,23	252:3,6,10,19	<b>once</b> 55:25 83:9
189:1,15,23	219:6,10,15	252:25 253:16	105:17 109:3
190:2 191:3,19	220:4,12,15,15	254:10,20	110:10 116:18
192:5,10,11,17	220:17 222:9	255:8,11,16	164:20 181:17
192:21 193:6	223:2,8,11	256:25 257:5	195:18
193:16,25	224:3,13,24	257:10 260:13	<b>ones</b> 49:2 51:2
194:6 195:7,11	225:8,10,19,24	261:4,18 262:2	77:6 124:1,19
195:24 196:6	226:3,11,20	263:19 264:15	142:13 203:1
196:11,15	227:3,19,22	264:18 265:8	203:18,19,21
197:2,12,16,24	228:9 229:15	266:24 267:9	203:25 206:22
198:16,25	229:17 230:3	268:14 269:22	206:25 240:13
199:23 200:15	230:15 231:1	269:25 270:5,7	242:11
200:21 201:3,9	231:10,14,19	270:21 271:9	<b>online</b> 72:5,13
201:12,19	231:21 232:7	272:1,7 273:20	72:22 73:5,15
202:9,13,16,18	233:2,8,13,21	274:6,18,22	145:11
202:20,23	234:13 235:7,9	275:6,10,15,23	

[open - paragraph]

Page 48

<b>open</b> 193:13 218:21,24 240:17 283:7 285:10 <b>opened</b> 164:19 <b>opening</b> 193:20 <b>operation</b> 16:15 17:23 <b>operations</b> 115:19 <b>opining</b> 9:1 <b>opinion</b> 84:10 125:20 132:8 244:16 <b>opinions</b> 8:14 18:8,10,11,14 18:16,21 19:1 19:1,3,5,10,16 19:23 20:7,9 20:13 21:4,5 21:15 30:2 35:20,24 36:4 84:15 198:13 280:25 283:2 283:13,23 284:2,8 <b>opportunity</b> 247:13 283:25 284:11,11,20 <b>opposed</b> 122:6 122:24 158:6 <b>opposite</b> 185:6 <b>opted</b> 121:20	<b>oral</b> 1:12,16 288:11,19 <b>orchestrated</b> 147:11 <b>order</b> 175:13 175:25 177:1 203:19 213:2 219:22 223:22 239:1 <b>organization</b> 68:8 85:18 139:22,23 141:11 <b>organizations</b> 44:17 62:13,20 63:3,13 64:6 64:13,16,23 65:1 68:6 101:1 138:8 <b>organize</b> 182:25 239:2 <b>original</b> 288:21 <b>ornate</b> 165:5 <b>ought</b> 125:2 127:22 137:14 137:17 <b>ounces</b> 254:25 <b>outcome</b> 289:16 <b>outside</b> 172:1,4 195:4 <b>overall</b> 46:6 48:5 249:22 250:1 254:6	263:23 265:10 <b>overarching</b> 83:20 <b>overcome</b> 151:1 <b>overdoses</b> 144:17 <b>overlap</b> 43:11 <b>overrides</b> 152:19 <b>oversee</b> 118:6,7 <b>overseen</b> 115:5 <b>oversight</b> 117:25 126:12 126:23 128:24 <b>overwhelming</b> 200:9 <b>own</b> 44:18 67:16 87:17 151:21 154:22 154:23 201:9 <b>owner</b> 53:12 110:2 173:11 189:14 <p style="text-align: center;"><b>p</b></p> <b>p</b> 2:1,1 <b>p.c.</b> 2:15 <b>p.m.</b> 1:19 134:20,21 199:3,3 209:7 213:15 216:18 218:2 219:15 223:5 247:16	247:16 284:25 284:25 285:22 <b>packet</b> 146:2 <b>page</b> 3:6,10,19 15:21,22,24 16:6 19:24,25 21:3,19,19 32:5,7,17 34:8 36:14,18,20,21 70:8 72:3 73:12 146:6,9 150:9,10 156:7 207:22 220:5 220:25 242:6 286:4 289:8 <b>pages</b> 18:7 32:15,22 33:14 144:2 146:9 249:6 <b>pair</b> 86:3 159:2 <b>pairing</b> 82:24 159:4 <b>pallet</b> 83:5 <b>palm</b> 51:7 158:13,24 159:19 <b>palms</b> 186:1 <b>paper</b> 143:22 195:20 196:2 204:3 <b>paragraph</b> 16:6 22:4 32:4 32:5,7 34:9 36:15,21,22
--	--	--	--



[paragraph - person]

Page 49

40:14 72:4 73:1,4 162:11 <b>paragraphs</b> 72:4 <b>parcel</b> 108:4 <b>parking</b> 180:1 <b>part</b> 32:22 71:10 76:13 83:21 88:11 99:4 108:4 126:13 147:17 152:25 162:5 162:11 169:23 170:16 175:14 191:15 195:19 237:20 239:10 <b>participate</b> 281:10 <b>particular</b> 54:23 118:16 147:24 156:24 160:10 165:2 <b>particularly</b> 113:14 117:18 134:10 135:23 139:13 140:9 155:16 187:20 245:10 <b>parties</b> 288:24 289:13 <b>parts</b> 146:2 <b>party</b> 289:3,11 <b>pass</b> 46:12 62:24 63:13	<b>passed</b> 95:16 <b>passing</b> 20:9 46:10 60:16,16 60:20 <b>past</b> 10:4 15:21 188:2,6 <b>paste</b> 16:17 <b>patrol</b> 60:4 117:17 179:19 205:9 <b>patrol's</b> 139:17 <b>pattern</b> 60:10 133:21 180:23 <b>paul</b> 118:17 <b>pause</b> 35:5 45:21 173:16 185:21 257:1 <b>paused</b> 179:15 <b>pawing</b> 53:23 <b>pay</b> 118:17 <b>payment</b> 59:1 <b>pending</b> 12:6 <b>people</b> 13:8 20:14 53:18,19 54:23 63:16 66:21 93:3 100:17 105:3 106:1 114:19 116:20 122:10 122:12 125:16 137:2 138:9 142:24,25 145:11 148:12 148:13 156:25	157:9,13 161:25 162:2,5 162:18 163:18 166:21 171:12 173:13 174:25 191:17 192:23 193:1,2 195:16 201:7 217:5,18 <b>people's</b> 66:24 279:2 <b>perceived</b> 208:23 <b>percent</b> 40:16 40:20,21 62:3 63:2,5,8,9 64:2 64:5 65:2 69:16 70:3,6 123:4,5,7 129:2 162:14 162:20 164:7,9 165:9,11,17 166:14 193:5 202:2,7,19,20 204:4,10 237:14 <b>percentage</b> 45:18 61:14 62:8 63:11 68:5,7 131:11 131:12,21 198:20 237:12 <b>perception</b> 31:8 112:19	<b>perfect</b> 46:3 150:25 <b>perform</b> 58:19 59:20 149:18 157:19 238:20 <b>performance</b> 47:18 122:1 165:21 <b>performed</b> 58:22 126:23 158:1 161:20 210:21 220:8 222:17 251:8 252:22 253:12 254:2,16 256:1 <b>period</b> 28:16,16 84:18 194:13 206:5,17 207:18 235:16 235:20 236:24 237:8 238:17 238:18 241:24 248:22 274:23 275:10,12 277:25 <b>permission</b> 153:6 155:2 157:6 174:8 <b>person</b> 104:3 111:18,22,24 113:25 122:4 126:3 141:12 145:6 180:4 287:12
---	---	---	--

[personal - poor]

Page 50

<b>personal</b> 125:19,20	<b>piece</b> 102:17 110:12	188:3 192:10 192:15 193:8	111:2,4 134:8 147:25 149:16
<b>personally</b> 287:8	<b>pile</b> 143:22	194:3	163:1 164:13
<b>personnel</b> 121:10 135:21	<b>pinpoint</b> 195:17 196:7	<b>played</b> 156:17 174:13 178:9	166:20 167:6 167:14,18
<b>perspective</b> 136:16 244:8	<b>pizza</b> 184:19	178:10 179:14	168:7 170:18
<b>pertained</b> 7:17 24:22	<b>place</b> 85:18 136:23 151:6	181:15 185:24 187:15 188:4	182:1 183:6 186:17 190:23
<b>pertinent</b> 19:3 32:23 35:24	157:17 174:17 200:6,7	188:25 190:1 190:17 192:13	192:6 193:12 193:19 194:17
<b>peter</b> 118:17	<b>placed</b> 66:19 104:20 157:3	192:20 193:10 194:5 196:19	196:23 197:16 197:23 198:4
<b>phase</b> 111:20	211:18 225:16	197:9	199:14 200:17
<b>phases</b> 108:25 109:7,10 110:8	<b>placeholder</b> 178:3	<b>playing</b> 156:14	221:22 281:13 282:14
<b>phonetic</b> 46:1	<b>placements</b> 106:12	<b>plays</b> 207:6	<b>pointers</b> 81:2
<b>phrase</b> 199:11 204:11	<b>places</b> 66:21 98:14	<b>please</b> 6:2,11 7:1 54:19	<b>points</b> 48:20 49:11 82:20
<b>phrased</b> 24:20 201:14	<b>placing</b> 223:24 223:25	179:6 233:1	181:20,22
<b>phrasing</b> 199:10	<b>plaintiff</b> 1:3,17 2:2 4:8 12:1	<b>plug</b> 273:22	<b>poison</b> 127:23
<b>physically</b> 87:23	288:3	<b>plummets</b> 203:6	<b>poisonings</b> 144:17
<b>pick</b> 80:10 81:9	<b>plaintiff's</b> 30:24	<b>plus</b> 39:14	<b>police</b> 8:23 16:13,13 39:5
<b>picks</b> 67:20 157:5	<b>plant</b> 78:24 94:5 97:5	<b>pocket</b> 59:11 168:1,20	39:8,15 45:25 50:24 72:7,14
<b>picture</b> 35:7,9 106:23 117:21	<b>platform</b> 145:1	169:13 180:13	73:20 84:20
156:11,12 197:10 233:3	<b>play</b> 83:8,12 84:21 88:18	<b>pockets</b> 171:13	<b>policies</b> 278:15
<b>pie</b> 122:11,13 122:23 123:12	153:13 154:14 174:11 178:8	<b>point</b> 6:25 7:1 17:19 23:11	<b>policy</b> 24:8,9 114:25 136:25
	178:19 179:5	63:1 66:5 72:25 77:1	<b>pondering</b> 9:24
		81:2 83:16 84:2 89:5	<b>poop</b> 217:16
		93:13 94:19	<b>poor</b> 63:21 215:13
		97:24 98:16	

[popped - probably]

Page 51

<b>popped</b> 10:6	<b>potential</b> 78:8	191:16	<b>principles</b> 40:7
<b>portion</b> 126:19	211:9	<b>present</b> 48:25	41:19 145:15
179:8,10	<b>pouch</b> 59:11	49:1,4 92:23	169:6
187:11 281:20	<b>pounds</b> 269:24	<b>presentation</b>	<b>printed</b> 143:7,9
<b>portions</b> 31:8	<b>practical</b> 94:14	48:13	<b>printout</b>
<b>position</b> 37:6,9	95:24	<b>presented</b>	143:23 146:17
116:19 135:23	<b>practice</b> 91:10	94:13	<b>prior</b> 11:24
157:3 200:21	92:20,25 93:2	<b>pressure</b>	13:22 68:14
201:1	93:4,6,7 94:23	183:23,25	145:22 176:1
<b>positive</b> 66:14	95:17 106:7	184:9	190:3 191:3,24
67:7,10,14,21	116:9,10	<b>presumptive</b>	204:6,12 206:1
70:1,2 129:1,5	138:18 183:16	255:7	208:5,7 218:8
129:8,16	<b>practiced</b>	<b>pretty</b> 15:6	282:23,24
148:18,24	128:13	24:8 38:10	<b>priority</b> 137:10
182:2 184:10	<b>practices</b> 40:8	53:18,25 88:23	137:11
252:17	41:20 96:21	136:9 177:19	<b>prisons</b> 76:23
<b>positives</b> 44:7	115:4 261:13	266:25	90:22
45:16 61:8	280:17,22	<b>prevent</b> 104:13	<b>private</b> 38:19
65:19 66:9	281:1,19	<b>preventing</b>	<b>proactive</b> 136:7
67:23 68:7,11	<b>pray</b> 81:1	90:17	136:21
69:10 140:16	82:11 83:8,25	<b>previous</b>	<b>probable</b> 16:12
<b>possibility</b> 54:3	<b>precise</b> 46:14	198:23 251:14	98:16 195:18
<b>possible</b> 55:10	<b>prefer</b> 65:6,8	<b>previously</b> 3:18	<b>probably</b> 5:9
57:10,10 96:23	<b>preference</b>	178:1 204:17	10:11 13:8
117:3 118:3	250:9	204:23 205:2	39:14 48:22
161:20 166:1	<b>preparation</b>	206:11 239:10	49:7 51:2
226:5,7 282:16	249:12	239:10	52:19 61:3
<b>possibly</b> 19:12	<b>prepare</b> 7:12	<b>prey</b> 82:25	62:19,24,25
29:18 168:4	49:4 112:12,13	109:9	65:21 83:4
170:24	<b>prepared</b> 85:21	<b>primary</b> 85:11	84:12 104:5
<b>post</b> 44:19,22	<b>prescription</b>	109:8 167:19	105:11 109:14
63:19 84:18	76:18	167:19 168:5	111:16 118:7
92:22	<b>presence</b> 152:3	<b>primes</b> 170:17	120:8 125:5
	152:7,9,14		137:19 140:12

[probably - purpose]

Page 52

179:2,3 216:13 226:15,17 279:1 <b>problem</b> 63:1 67:22 120:22 120:23 127:4,6 127:6,9,15 134:6,7 141:21 <b>problems</b> 117:10 132:17 139:11 163:24 163:25 221:2 <b>procedure</b> 1:24 4:21 285:7 <b>proceeding</b> 14:3 289:14 <b>proceedings</b> 285:22 <b>process</b> 83:14 85:11 102:15 102:15 135:8 136:7,8 159:11 <b>produce</b> 8:4 10:13,17 83:25 89:21 <b>produced</b> 1:16 9:14 26:14,17 72:5,12,12 73:1,5,16,24 74:6,14 120:11 120:16 274:1 <b>producing</b> 37:1 123:16 135:11 282:2	<b>production</b> 90:10 <b>productions</b> 72:6,14,18 73:10 <b>products</b> 144:15 <b>professional</b> 21:4,5,8 27:21 73:5,16 <b>proficiency</b> 45:9 56:9 64:2 101:14 107:5 201:15 203:6 <b>proficient</b> 48:7 105:9 201:17 203:4 <b>program</b> 42:21 115:11,17 118:9 122:21 139:17 <b>programs</b> 72:6 72:13 122:11 142:7 <b>project</b> 58:3 <b>promise</b> 51:24 130:20 <b>promote</b> 82:14 <b>promoted</b> 82:19 <b>promotions</b> 144:14 <b>prompted</b> 172:8	<b>proof</b> 91:11 92:20 93:8 94:6 95:18 96:11 <b>proofed</b> 96:23 <b>proofing</b> 90:15 90:16,17 91:6 97:22 207:10 210:21 211:6,8 211:12 <b>propensity</b> 211:9,9 <b>proper</b> 117:25 119:14 126:25 131:6 141:15 165:19 <b>properly</b> 118:6 118:23 119:1 147:11 163:22 163:23 <b>protocol</b> 126:25 136:23 <b>proved</b> 287:9 <b>provide</b> 18:25 19:1 24:16 32:21 87:13 175:1 201:5 <b>provided</b> 7:14 9:13,16 18:22 22:20 24:11 25:22 27:22 28:10,13 33:14 124:2,10,12 129:13 176:5	284:3,6 <b>provides</b> 37:24 155:24 <b>provisions</b> 1:24 <b>public</b> 287:20 288:15 289:5 <b>publications</b> 21:8 <b>pull</b> 43:22 44:10 47:24 143:25 146:11 151:17 152:4 248:21 249:19 280:10 <b>pulled</b> 44:5 126:1 150:19 247:25 <b>pulling</b> 49:5 127:14 151:12 193:1 <b>pulls</b> 179:20 181:21 <b>punishment</b> 88:20,20 147:13 148:17 148:19,24 149:4,9 184:10 <b>purchased</b> 84:5 85:15 <b>purely</b> 19:7 <b>purpose</b> 106:20 106:21 107:4 107:19 108:1 109:1 113:15
--	---	---	---

[purpose - reads]

Page 53

121:5,9,13 127:13 195:11 195:13 <b>purposes</b> 107:20 108:1 287:14 <b>pursuant</b> 1:23 289:1 <b>pursuit</b> 12:16 <b>push</b> 114:6 191:8 <b>pushed</b> 182:19 <b>pushing</b> 49:7 <b>put</b> 48:15 59:10 83:6 92:1 93:11,23 97:1 97:3 130:10 131:8 140:17 160:10 161:3 166:21 170:22 173:12 180:13 186:15 207:7 209:13 211:16 212:14 223:2 224:6,11 232:23 233:4 252:7 261:4,17 275:15 276:15 <b>puts</b> 179:20 <b>putting</b> 52:1 171:13 264:15	<b>q</b> <b>qualifications</b> 4:24 116:10 123:4 <b>qualified</b> 119:2 <b>qualify</b> 95:8 106:18 270:22 <b>quantity</b> 200:24 256:21 269:24 <b>quarter</b> 136:19 <b>question</b> 6:2,11 6:20,24,25 9:11 17:6 30:1 31:15,18 34:6 34:25 66:8 67:5 68:4 69:9 71:4 92:18 103:4,5 104:1 107:1 119:5 127:24 130:19 133:19 136:22 144:3,7,23 146:1 148:16 150:9 157:10 159:16 164:2 167:4 169:14 170:13,14 172:24 179:9 200:16 201:4 210:23,25 211:17 223:17 232:19 246:1	257:16,18 261:5,6,7 277:5 280:7 281:17 283:20 284:10,18,19 <b>questioning</b> 162:19 <b>questions</b> 6:18 19:12,18 32:20 70:15 94:14 135:2 145:1,3 171:21,22 226:15 280:7 285:5,19 <b>quick</b> 5:22 15:6 119:25 172:24 199:1 266:25 284:23 <b>quite</b> 27:17 31:14 55:5 127:11 136:15 162:7 218:13 223:1 <b>quote</b> 105:3 <b>r</b> <b>r</b> 2:1 37:18 <b>rabbit</b> 86:22 94:21 106:2 <b>rabbits</b> 86:19 <b>radio</b> 182:2 <b>raised</b> 5:12 <b>raises</b> 17:6	<b>ran</b> 106:4 187:23 188:2 209:25 <b>range</b> 28:17 34:21,22 60:15 60:16,17 62:20 <b>rapidly</b> 138:13 <b>rare</b> 123:23 <b>rarely</b> 47:3 <b>rate</b> 61:14,15 129:1 <b>rather</b> 38:14 <b>rbf</b> 1:5 288:5 <b>reaction</b> 97:19 117:6 199:25 237:18 <b>reactive</b> 136:8 136:9,18,21 <b>read</b> 16:10,16 22:11 49:5 72:11 75:19 147:7 150:21 164:3 167:5 176:12 209:24 218:17 220:14 220:16 223:21 240:12 257:7,9 260:25 282:21 283:3 287:1 291:9 <b>reading</b> 9:23 77:1 217:13 <b>reads</b> 36:22 250:15
---	--	---	--

**[ready - records]**

Page 54

<b>ready</b> 15:13,14 112:14 170:9 179:21 206:14 206:15	279:14 281:17 <b>realm</b> 52:14 <b>rear</b> 161:3 <b>reason</b> 7:8 20:22 48:22,24 103:16 120:17 158:11 171:20 180:5 185:5 235:11 274:2 274:14 279:25 283:1 286:4 291:11	180:18 282:7 284:15 <b>receiving</b> 135:13 181:3 <b>recent</b> 39:24 122:6,23 124:1 124:3,19 203:5 203:25 205:25 <b>recently</b> 94:12 144:16 <b>recess</b> 70:10 134:20 199:3 247:16 284:25 <b>reciting</b> 290:9 <b>reckoning</b> 96:10 <b>recognize</b> 70:12 74:10 128:16 134:23 173:23 178:8 198:21 199:5 205:4 247:18 285:2 <b>record</b> 1:24 4:12,18 6:3 31:16 35:11,13 35:14 70:12 74:8,10 108:17 121:25 128:14 128:16 134:19 134:22 138:8 139:10 156:18 158:25 173:18 173:20,23	178:18 179:6,8 182:11 194:11 199:4,23 207:7 208:4 215:24 238:10 239:9 240:1 246:15 247:17 248:18 252:21 257:4 260:11 264:9 264:11 266:23 272:8 285:6,21 288:19 <b>recorded</b> 212:4 225:22 235:14 <b>recording</b> 233:17 <b>recordkeeping</b> 121:7 221:3,12 237:22 238:3 250:24 <b>records</b> 22:10 28:7,23 29:3,3 84:4,16 119:21 119:24 120:6 120:11,15,17 121:9,13,17 122:6,6 123:13 124:3,15 125:1 126:16,16 128:1,7,19 130:12 135:4 135:22 136:11 136:13,15,19 136:24 138:9
--	--	---	--



[records - remember]

Page 55

138:19,21 139:7 140:24 199:1 201:16 201:18 202:21 202:24 203:16 203:24 285:8 <b>recount</b> 179:2 <b>recreational</b> 78:10 95:10,15 98:19 <b>reference</b> 20:20 23:11 25:24 28:6 34:9,20 40:13 72:1 100:6 153:9 164:6 183:6 201:13 218:7 218:11 <b>referenced</b> 291:6 <b>references</b> 20:7 36:14 92:17 205:12 <b>referencing</b> 20:24 <b>reflect</b> 115:13 279:24,25 <b>reflected</b> 61:17 121:4 <b>reflection</b> 74:15 145:13 190:22,25 194:16 196:13	<b>reflections</b> 192:3 <b>refractory</b> 98:14 <b>refresher</b> 5:22 <b>regard</b> 94:24 <b>regarding</b> 27:14 <b>regardless</b> 137:15 160:4 <b>register</b> 276:11 <b>registration</b> 289:24 290:19 <b>regular</b> 136:24 <b>regulation</b> 78:15 <b>reinforce</b> 87:18 99:5,6,18 100:2 131:12 131:13,15 132:3 149:8 161:7 162:12 162:13 163:8 164:7,24 165:19 <b>reinforced</b> 80:1 83:10 131:19 165:7 <b>reinforcement</b> 83:15 86:5,18 99:10 107:8 147:9 159:3 163:12 184:11	<b>reinforcements</b> 87:15,16 165:24 <b>reinforcer</b> 84:23 86:10,12 86:24 109:13 110:11 153:3 153:14,15 154:15 159:10 167:7,19 <b>reinforces</b> 89:13 <b>reinforcing</b> 83:13 86:9,12 87:15 88:11 131:22 164:1 164:17 165:1 <b>rejoined</b> 214:14 <b>related</b> 16:11 289:13 <b>relationship</b> 43:8 51:18 <b>relationships</b> 111:12 <b>relative</b> 142:12 <b>relatively</b> 280:3 <b>reliability</b> 102:16 103:8 119:22 127:7 128:20 136:5 <b>reliable</b> 101:8 122:5 126:18 126:24,25	134:2,2 135:15 <b>reliably</b> 126:20 <b>relied</b> 7:20 21:14 32:8 33:15 34:1 36:9 282:2 <b>relieve</b> 59:12 <b>relying</b> 22:19 32:9 205:14 278:10 <b>remain</b> 153:12 <b>remains</b> 39:24 75:16 85:23 <b>remark</b> 239:12 <b>remediated</b> 127:5 <b>remediating</b> 134:12 <b>remediation</b> 37:1,8 40:13 40:14 41:17,25 42:11 43:2,3,9 43:14,16 44:8 47:24 48:9 103:24 120:19 127:2,8 130:16 <b>remember</b> 10:24 13:2 23:17 70:17 71:1 133:1 135:6 165:1 182:20 188:16 201:15 203:1 204:1,2 239:6
--	--	---	---

[rene - reviewed]

Page 56

<b>rene</b> 263:1	253:7 258:5	278:10 279:3	<b>results</b> 44:9
<b>repeat</b> 6:22	279:8,23 280:7	<b>represent</b> 4:8	<b>resume</b> 15:22
170:19 171:2	280:9 282:2,13	148:13 248:20	16:3 33:9,15
<b>repeated</b> 44:7	282:17,23	<b>representation</b>	33:18 35:21
45:16 61:8,10	283:13,16,20	146:18	73:25
64:25 68:6	283:23 284:8	<b>requested</b>	<b>retiring</b> 34:13
89:17	284:13	20:16,18 289:3	<b>retrieve</b> 99:21
<b>repeatedly</b>	<b>reported</b> 1:21	289:10	<b>retriever</b> 51:4,5
61:11 89:19	<b>reporter</b> 4:17	<b>research</b> 75:22	52:19 57:11
<b>repeating</b> 14:6	4:24 6:3,7	<b>reserve</b> 285:18	86:19 158:12
<b>repetitive</b>	35:12 37:16,19	285:20	<b>retrieving</b>
161:25 214:11	72:8,10 90:25	<b>residue</b> 92:7	99:24
<b>report</b> 3:11	91:2 134:19	<b>resolve</b> 139:6	<b>return</b> 291:13
7:20,23 8:3,4,8	152:9,11	<b>resolved</b> 12:4	291:16
8:18 9:10,12	173:21 174:18	13:9 163:25	<b>returned</b> 289:6
10:9,15,15	178:5 186:6,8	<b>resources</b>	289:7 290:11
14:24 15:19	186:11,13	117:5 118:19	<b>returning</b>
16:3 17:15,22	194:12 195:22	<b>respect</b> 138:22	28:10
17:24 18:6	195:24 248:3	281:10	<b>returns</b> 157:5
19:25 26:17	248:13,17	<b>response</b> 58:5	<b>review</b> 6:16
27:16,25 29:22	285:17 288:15	79:25 80:15	9:16 10:14
30:2 31:19,24	<b>reporter's</b> 3:7	132:20,22	20:2 27:25
32:1,16 33:14	288:11	183:11,22	29:20 30:21
33:16 34:2	<b>reports</b> 3:14	<b>responsible</b>	71:18,23 120:6
35:21,21 36:4	17:2 26:4,10	36:23,24 37:6	125:2,6 126:5
36:10 49:9	26:12,14,18,22	<b>rest</b> 17:15	128:19 135:14
70:9 72:1	27:6,13,22	176:3 191:21	136:4 139:7,10
123:16 198:5,8	28:3 29:8	<b>restart</b> 183:16	240:12 290:7
198:12 202:2,9	137:9 206:20	<b>restrain</b> 184:2	291:7
204:11 205:12	206:22 238:17	<b>restraint</b>	<b>reviewed</b> 7:14
208:20 211:18	239:24,25	184:11	9:13 24:3,23
212:6 240:20	240:2,13 244:9	<b>result</b> 167:16	25:11,21 27:13
240:20 243:16	248:22 249:9	169:3	28:4 29:23,25
250:15 251:4	277:17 278:4,7		32:8 71:21

[reviewed - right]

Page 57

138:20 198:8	<b>rewards</b> 84:21	93:14,17,21	169:5,9,11
202:21 206:22	86:10 99:6,15	94:18,25 96:7	170:17 171:9
214:1 224:25	108:20 111:2	96:13,25 97:11	171:14 173:22
249:11 282:14	150:2	98:20 101:2,5	175:13,25
285:8	<b>rid</b> 98:20	101:24 102:8	176:9,18,21
<b>reviewing</b>	<b>right</b> 4:16 6:16	102:11,11,25	178:13,15
22:22 125:1,15	7:8 8:5 10:21	103:8,11,11,14	179:22 180:23
125:23 126:16	12:19 13:20	104:22 106:12	181:6,10 182:4
131:3 135:4	14:23 15:15,22	106:22 110:16	182:11 184:21
136:24 211:25	15:25 16:3	110:24 112:1	184:22,24
226:8	18:8 21:9 22:7	114:12 118:13	185:14,18,23
<b>reviews</b> 26:18	22:11 25:1,19	119:6,12,17,21	188:23 190:5
128:1 130:11	26:8 32:10,15	120:4 121:15	190:18 191:1
<b>revise</b> 282:17	33:10 34:13	122:25 123:7	194:2,7,9,15,17
283:2	37:3 38:15	125:23 126:18	194:20 196:13
<b>revised</b> 282:22	39:1 42:5,5	128:4 129:21	196:17,21
282:24	49:10,25 50:3	130:25 132:16	197:3,11,14,17
<b>reward</b> 58:12	51:1 53:5 54:9	132:21 133:11	197:21 198:10
66:12 85:11	56:19 57:20,24	133:13,16	199:8,10 202:2
86:5,10,11,13	58:2,4,13	134:17 135:9	203:14,14,17
86:18 88:12	59:18,22 60:17	135:13,15,25	205:23 206:10
89:1,22 99:5	60:18 61:20,25	136:7,18	206:16 207:22
109:8 130:23	62:17,18 64:5	138:16 140:17	207:24 208:19
149:8,11,13	68:25 69:2,5	142:19,20	209:1,4,7,17
162:25 166:8	70:4,20 71:12	143:4,15,18	211:21,23
167:7,19 168:5	72:16 73:7	146:2 147:14	212:16 213:13
<b>rewarded</b>	75:3 76:4 78:9	148:1 150:21	213:15 214:7
149:18 197:17	78:14,14 79:13	151:9,9 152:9	214:17,25
197:19	80:6,17 81:15	152:21 154:3,3	215:2,5 216:19
<b>rewarding</b>	82:5 85:1,12	154:22 156:13	217:1,5 218:3
100:1,3 102:25	86:2 88:2,7,16	156:20 158:3,4	218:5,8,12
103:20 104:6	88:22 89:10,25	158:9 159:2,23	219:16,20,22
128:3 130:21	90:5 91:15,21	160:5,22 161:5	219:23,25
131:4 150:1	92:1,8,25	164:17 165:10	220:2,20

**[right - run]**

Page 58

222:11,13,14	252:1,4,7	280:15,17	<b>rob</b> 118:16
222:17,22	253:2,4,7,10,12	282:3 284:23	<b>robert</b> 5:3
223:13,15,18	253:14,17,20	285:4	<b>rod</b> 186:12
225:1 227:4,8	254:2,14,21	<b>rigid</b> 162:3	<b>role</b> 16:15
227:12,13,15	255:17,21,22	<b>risk</b> 184:24	83:12 88:10
227:17,23	256:1,3,6,9,11	<b>ritual</b> 55:3	117:15 134:10
228:1,5,7,10,15	256:17,19,20	58:21 59:4,16	134:11 144:10
228:17,19	257:20,20,22	59:17,20 60:8	152:16 160:19
229:4,6,8,12,18	257:25 258:5	60:9 111:14	183:13
229:20,22,24	258:10,14,16	112:8,10,11	<b>roll</b> 13:14 83:5
230:1,7,9,11,13	258:22 259:1,4	155:12,24	<b>room</b> 4:11
230:16,18,22	259:7,11,14,19	156:1,25 157:7	88:21 108:18
230:24 231:3	259:22 260:1,2	157:9,13,16,21	131:8 132:7
231:14,17,22	260:4,14,16,18	158:1 160:19	147:7 163:18
231:24 232:1,3	260:20,23	160:21 161:12	166:21 174:4
232:5,8,10,12	261:7,8,10,24	161:13,19,20	<b>rope</b> 57:20,22
232:16,18	262:7,8,10,16	161:22 162:5	276:16
233:22,24	262:18,21	169:23 170:6,8	<b>rough</b> 9:14
234:1,4,6,11,17	263:1,5,19,21	170:17,20	10:1 123:19
234:21,23	263:23,24	171:2,6 179:25	202:12
236:2,10,15,20	264:21 265:2,4	180:23 181:7	<b>roughly</b> 206:5
237:1 238:5,21	265:6,10,23,25	183:16	<b>round</b> 223:6
238:24 239:7	266:3,6,9,12,14	<b>rituals</b> 111:9	<b>row</b> 151:4
239:15 240:17	266:16,19,20	111:12 112:6	207:9 274:1,7
240:18,20	266:21 267:3,5	113:22 155:16	<b>rubber</b> 57:17
241:6,9,20	267:7,10,12,14	156:4,4 157:1	57:19
242:5,19,22,24	267:18,20	179:25 180:10	<b>rule</b> 155:15
243:4 244:19	268:9,14,16,20	183:14	164:3 289:1
244:20,22	268:23 269:16	<b>road</b> 2:4 33:20	<b>rules</b> 1:23 68:8
245:1,5,8,20	269:20 270:7,8	87:11 105:6	68:9 150:10,11
246:22 247:3	270:16 273:12	163:3 184:18	150:15,16
247:21 248:11	273:21 274:10	185:7	162:7 285:7
249:12,14,21	275:5,15,25	<b>roadside</b> 166:3	<b>run</b> 39:14
251:8,11,20,23	276:9 278:7	185:3	68:13 106:2

[run - secondary]

Page 59

123:18 141:11 141:12,19 164:14 201:20 242:20 246:17 <b>running</b> 47:22 184:3 187:19 <b>runs</b> 122:22 <b>rush</b> 36:16	<b>saves</b> 204:18 <b>saw</b> 19:2 30:23 49:9,10 174:15 175:11 183:1 189:5 199:23 282:25 <b>saying</b> 14:6 17:22 40:25 41:6,14 51:9 63:7 65:9 67:9 69:21,24 70:7 113:6 119:19 122:19 149:23 152:13 169:14 175:12 188:7 188:19 200:15 <b>says</b> 21:4 22:5 50:2 72:4 73:4 111:14 150:14 167:25 174:3 182:2 185:18 198:5 202:2 207:9 241:5 250:1,13 254:7 264:2 <b>sbarron</b> 2:17 <b>sbcglobal.net</b> 2:24 291:2 <b>scale</b> 46:21,25 47:22 48:4 60:20 <b>scenario</b> 45:6 48:6 64:3 108:14,15	110:15 <b>scenarios</b> 92:23 129:24 134:3 <b>scene</b> 9:2 20:23 112:25 182:14 183:7 184:13 <b>scent</b> 60:24 107:6 153:2 <b>schedule</b> 15:25 16:3 78:6 94:19,20 166:2 <b>scheduling</b> 114:17 <b>school</b> 46:1 235:6 <b>schott</b> 1:3 4:8 18:3 179:17 205:22 232:8 237:1 238:20 288:3 291:4 <b>schott's</b> 181:19 206:7 <b>scratch</b> 9:10 <b>scratching</b> 82:16 <b>screen</b> 146:12 181:10 190:25 207:7 247:25 <b>scroll</b> 248:12 249:7 274:21 <b>scrolled</b> 249:3 <b>scrolling</b> 156:13	<b>seal</b> 287:17 <b>seam</b> 181:11 <b>search</b> 69:22 107:7 111:5 155:5 157:5 174:3 191:21 193:14 195:21 210:1 218:16 221:5,6 225:20 232:21 245:25 <b>searched</b> 126:2 175:15 <b>searches</b> 46:7 68:20 104:15 104:17 173:5 210:7,8,9 <b>searching</b> 87:7 100:22,22,22 107:8 165:2,22 <b>seat</b> 96:17 <b>second</b> 4:7 29:21,23,25 31:13,20 47:12 79:8 100:24 122:8 125:1 156:19 163:7 170:16 173:16 185:23 186:1 189:21 192:8 192:10 205:3 232:21 251:14 256:23 <b>secondary</b> 138:23
<b>s</b>			
<b>s</b> 1:22 2:1,20,21 287:24 <b>sacred</b> 118:24 <b>saenz</b> 2:20 4:15 <b>safe</b> 102:4 <b>safety</b> 81:24 82:18 127:14 184:24 <b>sake</b> 236:13 <b>salazar</b> 1:7 288:7 <b>sales</b> 236:1 <b>samples</b> 94:11 94:11 <b>samwise</b> 58:1 <b>san</b> 1:2,23 2:23 288:2 <b>santa</b> 16:13 <b>sat</b> 94:13 133:22 137:6 175:11 <b>save</b> 17:5,11,13 <b>saved</b> 16:23			

[seconds - sense]

Page 60

<b>seconds</b> 122:13	152:21 156:1	227:14 229:1	178:7 193:18
156:16 189:17	157:16 158:18	231:10 234:20	194:23 196:24
190:6,13	164:14,15	235:12 236:1	197:25 239:21
191:24,24	166:25 167:3	240:3,15,23	239:22 245:11
<b>section</b> 21:20	169:7 172:10	241:14,17	285:12
26:7 31:24	172:23 173:2	242:16,16	<b>sees</b> 109:9
144:16	173:13 174:4	248:6,9 249:3	112:13 113:12
<b>sector</b> 139:20	179:15 181:10	249:22,23,24	<b>segment</b> 146:5
<b>see</b> 7:22 12:19	181:18 182:18	250:3,18,25	146:23 150:4,6
19:24 20:3	185:13 187:13	251:2 252:2,17	156:19 162:10
21:21 22:5	187:14,17	252:17 254:20	166:24 167:1
23:5 27:24	188:3 189:25	261:19 264:5	172:23,25
28:6 30:17	190:22,24,24	274:1 275:7,7	173:3 181:20
35:7,10 56:2	191:1,12 192:8	275:17,18	181:25
57:5 64:18	192:14 194:3	276:20 277:4	<b>segments</b> 169:2
65:9,15 68:18	194:16,19	282:9,10 283:7	179:5
69:24 70:7,24	196:12,15	<b>seeing</b> 75:21	<b>seized</b> 90:22
72:2 76:16	200:15 205:21	123:22 129:19	<b>selection</b> 87:11
78:7 84:25	207:6,14,17	231:13	163:23
97:2,17 98:4	208:4 209:15	<b>seek</b> 153:17,18	<b>self</b> 5:4 24:9
99:23 107:15	209:20 210:20	<b>seeking</b> 177:13	<b>sell</b> 72:20 272:2
113:6,23	210:25 211:21	<b>seem</b> 251:25	<b>semen</b> 75:20
118:22 120:9	211:22,22	<b>seemed</b> 71:4	<b>semi</b> 100:22
122:3,10 124:2	212:19,22,25	<b>seems</b> 27:2	<b>semicolon</b>
124:6 127:5,12	213:5,9,23	44:18 125:22	16:10
127:13 128:10	215:7,9,11	126:14 165:21	<b>seminars</b> 38:16
132:3,13 133:1	216:22,22,24	243:5	<b>send</b> 15:4
133:2,2,4	216:24,25	<b>seen</b> 15:16	130:16 248:1
134:4 136:19	217:4,24 218:7	44:22 50:16,19	248:11 279:18
138:9 139:14	218:20 219:6	54:11,12 56:19	<b>sending</b> 119:3
141:7,21 146:9	219:24 220:17	56:21 82:8	<b>sense</b> 4:19 6:4,8
147:7,8,25	220:22 222:6,6	93:1 118:2	6:22 8:10
149:23 150:5	222:10,21	121:3 171:8,12	25:10 28:12,16
150:18 152:20	223:8,11 226:1	171:13 172:6	28:19 49:14



[sense - signature]

Page 61

58:6 68:4 89:3 101:22 107:1 109:10 110:24 115:5 126:12 144:20 145:18 146:3 159:25 190:3,15 <b>senses</b> 138:2 <b>sent</b> 252:15 291:14 <b>sentence</b> 22:5 36:22 155:3 <b>separate</b> 112:8 116:5,5 <b>separates</b> 161:15 <b>sequence</b> 175:10 <b>sergeant</b> 16:14 115:18 136:14 <b>series</b> 44:24,24 46:2 67:19 <b>serious</b> 120:22 127:11 <b>served</b> 288:23 <b>service</b> 8:24 16:13 <b>services</b> 11:18 12:2 37:22,24 37:25 38:14,15 38:20,20 <b>servitude</b> 161:10	<b>session</b> 108:2 108:11 209:12 210:14 <b>sessions</b> 106:14 235:21 236:7 <b>set</b> 12:9 30:22 64:11 67:16 68:9 69:5 100:20 111:6 128:24 129:23 130:1,6 134:3 203:24 225:13 <b>setting</b> 38:13 157:22 <b>settled</b> 173:17 <b>settles</b> 174:20 <b>settling</b> 210:3 <b>setup</b> 138:11 <b>seven</b> 220:8,9 231:11 234:14 275:18,23 276:23 277:6 <b>several</b> 26:5 <b>shake</b> 245:11 245:12 246:2 271:3 <b>shape</b> 81:6 106:1 <b>sheet</b> 207:8,9 209:14 240:18 248:7 274:1,15 287:24 291:11 <b>sheets</b> 279:16 279:19,23,24	<b>sheldahl</b> 1:13 1:16 3:4,11 4:1 4:5 5:3,13 41:24 70:12 74:9 108:17 128:15 134:23 199:5 279:21 286:2 287:1,4 287:9 288:12 288:17 291:5 <b>sheriff</b> 184:18 <b>sheriff's</b> 24:8 29:1 34:12 37:14 42:3 43:18 125:11 142:8 145:19 145:24 243:19 <b>shift</b> 110:23 139:5 142:4 238:23 <b>shifted</b> 78:6 <b>shooting</b> 123:6 <b>short</b> 53:17 <b>shortcut</b> 65:23 <b>shorthand</b> 1:21 288:14 <b>shortly</b> 77:14 <b>shot</b> 123:4 <b>shoulder</b> 174:23 175:4,5 175:9,12,17 176:1 177:3 <b>shove</b> 59:11	<b>show</b> 6:15,17 44:9 110:3 131:18 138:10 140:2 143:2 147:2 159:11 170:24 177:22 177:24 188:17 204:14 248:7 273:25 <b>showing</b> 211:9 <b>shown</b> 94:10 288:24 <b>shows</b> 50:25 53:12 219:4 233:6 <b>side</b> 14:20,21 14:22 48:17 94:15 117:17 175:22,22,23 182:3 184:16 184:21 185:7 187:19 203:19 203:21 209:18 <b>sides</b> 108:18 <b>sign</b> 72:23 290:9 291:12 <b>signal</b> 158:13 <b>signals</b> 50:11 <b>signature</b> 3:6 241:20 245:7 246:21 251:11 252:3 253:14 254:4,18 255:16 256:3
--	--	--	---

[signature - sniff]

Page 62

256:13 257:22 258:7,16,18,19 259:3,16,24 260:6,20 261:10 262:12 262:24 264:23 265:6,14,25 266:8,16,22 267:7,12,22 268:4,16,25 269:7,14 270:12 271:9 271:16 272:10 272:19 273:2,9 273:18 286:1 287:2 289:2,5 289:8,20 290:11 <b>signed</b> 263:21 <b>signatures</b> 277:21 <b>signed</b> 263:3 291:19 <b>significant</b> 278:22 <b>signifies</b> 80:21 80:21 <b>signify</b> 80:23 <b>similar</b> 68:23 115:21 247:3 <b>similarity</b> 102:13	<b>simple</b> 151:4 238:3 <b>simpler</b> 95:11 207:12 <b>simplistic</b> 238:3 <b>simply</b> 59:25 135:18,23 160:7 163:25 <b>single</b> 22:2 34:19 43:1 48:6 60:7 71:11 104:15 104:17 105:20 106:11 113:15 116:16,17 138:11 176:7 176:16 177:14 225:2 <b>sir</b> 173:22 235:7 247:18 248:21 257:3 <b>sit</b> 17:16 49:22 50:2,19 51:7 51:12 110:17 111:6 132:21 158:13,17,22 159:19,23,23 160:9,10 161:3 161:6 202:14 224:24 282:12 <b>site</b> 236:4 <b>sits</b> 66:11 160:9 181:25 189:11	<b>sitting</b> 18:13 49:25 51:3,12 62:20 75:5 82:4,16 89:20 133:16 160:22 160:23 191:5 191:25 204:9 <b>situation</b> 43:17 51:21 68:23 98:5 111:25 126:4 127:1 130:15 165:18 172:7 <b>situations</b> 152:18 165:16 165:19 172:20 <b>six</b> 18:8,10,16 18:20 19:6,11 38:9 46:3 47:22 60:17 105:6,23 209:9 210:14,18 213:15 215:1,4 220:9 221:5 230:5,16 231:3 231:11,22 232:10 233:22 236:7 275:18 275:23 276:23 277:5 <b>size</b> 115:11,21 143:6 <b>skeptical</b> 105:16	<b>sketch</b> 10:23 44:23 <b>skill</b> 155:18 <b>skip</b> 29:6 118:20 155:11 155:12 188:1 <b>skipped</b> 187:18 <b>slide</b> 43:15 44:8 101:18 <b>slides</b> 57:8 <b>slippery</b> 153:6 154:8 174:24 175:24 <b>slope</b> 153:7 154:8 174:25 175:24 <b>slow</b> 106:3 109:15 189:15 <b>slower</b> 152:13 <b>slowly</b> 153:1 <b>small</b> 141:24 270:25 <b>smaller</b> 115:25 116:1 139:23 139:25 <b>smarter</b> 53:21 <b>smell</b> 155:7,7 188:9 <b>smoke</b> 106:3 <b>snapshot</b> 71:2 <b>sniff</b> 40:21 46:5 55:6,18 58:25 59:9,15,22 60:1,5,21 63:3
---	---	---	---

[sniff - spend]

Page 63

63:19 77:2	232:12 233:24	190:25 193:11	<b>space</b> 49:6
111:15 131:4	234:17 235:18	208:25 214:10	195:5
140:6 155:7	235:19 237:4,5	217:10 226:25	<b>sparse</b> 39:17
157:7 159:5,9	237:6,15	228:21 230:4	<b>spatter</b> 75:19
159:9 160:3	<b>snow</b> 281:11	231:20 233:8	<b>speak</b> 6:6,7,21
170:5,10	<b>sole</b> 144:12	235:14 245:8	85:19
171:11 176:3	<b>soledad</b> 1:22	246:24 261:20	<b>speaking</b> 45:2
179:18,21	2:22	262:21,23	85:8 115:8
180:6 182:7,25	<b>solid</b> 110:11	268:22 275:4	182:13 194:22
184:8 187:8,24	<b>solution</b> 149:7	284:4	195:12
187:25 195:8	163:7,7	<b>sort</b> 41:13	<b>spears</b> 26:21,23
195:21 218:5	<b>solutions</b>	54:22 61:4	<b>special</b> 115:19
237:7	289:23 290:17	90:1 96:22	<b>species</b> 78:23
<b>sniffed</b> 48:13	291:23	127:6 136:22	<b>specific</b> 38:24
<b>sniffing</b> 87:6	<b>somebody</b> 79:3	149:6 150:15	60:10 71:7
140:11 165:22	104:19 116:12	166:15 170:12	80:12 95:13
174:20 187:20	117:22 118:3	172:8 283:15	101:16 209:25
209:25	125:25,25	<b>sorts</b> 26:15	264:9
<b>sniffles</b> 229:5	139:17 161:14	100:23 102:10	<b>specifically</b>
<b>sniffing</b> 93:21	172:1 181:4	<b>sound</b> 43:9	16:11 30:11
<b>sniffs</b> 25:14	219:3 277:15	142:20 179:13	115:1
62:2 66:10	<b>someday</b>	194:9 245:23	<b>specifics</b> 79:2
68:24 166:2	138:15	<b>sounds</b> 14:8	<b>specifying</b>
195:1 207:10	<b>somewhat</b>	31:5 40:1	217:22
210:8,9,10,14	98:14	46:18 61:24	<b>spectrum</b> 41:13
213:19 215:4,5	<b>soon</b> 88:23	91:18 98:25	41:23 62:8
216:22 219:18	94:19	99:12 103:5	<b>speculation</b>
220:9 222:16	<b>sorry</b> 16:17	133:12 165:14	128:9
223:11 224:9	29:7 30:19	232:23	<b>speed</b> 12:16
227:8,25	32:6 43:19	<b>source</b> 60:22	15:20 144:6
228:12 229:1	46:16 57:14	195:8 196:8	<b>spell</b> 176:25
229:20 230:7	72:12 104:16	200:5	<b>spend</b> 37:5
230:18 231:5	119:1,8 168:21	<b>south</b> 5:12	100:10
231:10,24	172:25 189:21	12:15	

## [spending - strong]

Page 64

<b>spending</b> 38:7	<b>stares</b> 147:18	<b>state</b> 1:20 14:3	129:25,25
<b>spent</b> 33:20	148:1	14:4 78:10	131:18 162:15
34:15 235:13	<b>staring</b> 82:15	95:9,13,15	196:2 232:8
<b>spoke</b> 65:21	147:16,21	98:14,18	234:10 237:1
<b>sports</b> 72:21	149:25 150:2	195:19 261:21	238:19 281:18
<b>spot</b> 163:8	<b>start</b> 15:15	287:6,21	<b>stopping</b> 90:17
<b>spreadsheet</b>	21:17 22:4	288:15 290:2	<b>stops</b> 281:3,5
210:11 217:22	46:23 59:21	<b>stated</b> 1:24	281:15,24
<b>spreadsheets</b>	66:17 75:10	55:18 237:24	<b>storage</b> 75:18
3:16	80:13,20 90:9	<b>statement</b>	<b>story</b> 53:7,17
<b>stage</b> 12:7	100:17 101:18	290:9	<b>straight</b> 60:4,5
110:23,24	105:14,14,16	<b>statements</b>	<b>strategy</b> 224:11
150:12 153:9	105:19 129:19	205:15	<b>streaming</b>
162:24 167:22	131:23 134:9	<b>states</b> 1:1 77:18	72:21
168:3,23	157:17,17	77:25 78:9	<b>streamline</b>
<b>stamp</b> 239:3	159:7,8 162:2	142:7 288:1	32:19
<b>stand</b> 17:15	163:14 179:12	<b>static</b> 182:16	<b>street</b> 1:22 2:22
81:1	179:21 184:9	<b>stay</b> 106:1	76:25 77:16
<b>standard</b> 44:11	187:13 189:24	<b>staying</b> 163:5	94:16 97:25
44:13 45:17	196:17 207:21	<b>stays</b> 153:2	100:21 101:15
64:5 65:2,14	208:15 209:1	<b>stealing</b> 53:5	113:2 131:13
69:2 81:8	241:23 249:14	<b>steeped</b> 120:8	131:15 162:13
92:19 105:1	<b>started</b> 61:6	<b>step</b> 47:2 54:15	164:1,7,14
107:22 112:24	85:22 86:3	59:11 62:12	165:17,24
155:15 162:17	115:16 166:3	65:25 130:15	166:9 289:23
177:15 188:11	180:1 209:6	<b>stephen</b> 2:14	290:18
<b>standards</b>	213:14 214:25	4:13 15:3 35:2	<b>streets</b> 43:23
27:21 44:14,20	<b>starting</b> 79:19	35:4 214:16	44:4,6 47:21
44:22 92:22	180:6 242:9	<b>sterile</b> 67:3	47:24 95:20
205:9	248:25	<b>steve</b> 114:15	110:24 127:9
<b>stands</b> 200:14	<b>starts</b> 58:3	214:13 257:2	<b>strike</b> 247:10
<b>stare</b> 147:10	100:14 130:12	<b>stop</b> 20:2 24:18	<b>strikes</b> 92:6
148:17 149:16	166:6 189:11	71:19,21 87:21	<b>strong</b> 250:9
149:22 150:1	189:11	91:4 126:1	

[stronger - suppose]

Page 65

<b>stronger</b> 283:23	152:5,13,17 191:16 192:9	<b>subtle</b> 176:19	<b>supervisor</b> 93:22 115:9,16
<b>strongly</b> 155:16	<b>styled</b> 1:18	<b>success</b> 63:11 198:21	115:18 116:2,3
<b>structure</b> 18:6 47:5 100:6,20 103:23 104:10 114:21 209:25 226:1	<b>styles</b> 57:23 175:18	<b>successful</b> 59:1 74:24 159:10	116:5,10,16,20 117:7,9,11
<b>structured</b> 104:13 110:1 224:23	<b>submit</b> 17:8	<b>sufficient</b> 41:3 60:6 61:16	118:2,4 119:1 119:7,9,20
<b>struggles</b> 139:3	<b>submitted</b> 25:16	<b>sugar</b> 90:24 91:1,4	120:5 125:2 126:5,11,24
<b>stuck</b> 123:11	<b>suboxone</b> 76:17	<b>suite</b> 1:22 2:5 2:10,16,22	128:1,19 130:11 131:2
<b>student</b> 41:4 75:8	<b>subscribed</b> 287:12 290:13	<b>sum</b> 235:12 282:6,9	135:23,24 136:13 137:14
<b>students</b> 144:22	<b>substance</b> 79:17,20 83:6 91:8,19 99:21 99:24 129:11 153:17 198:22 211:2 246:8,10 290:8	<b>summaries</b> 27:7	138:19,25 139:11,14 140:25 226:8 226:12
<b>studies</b> 94:22	<b>substances</b> 68:19,20,22 76:4 79:9,12 88:6,10 90:18 129:9	<b>summarize</b> 179:5,16 181:17	<b>supervisors</b> 118:23 125:1 135:4
<b>study</b> 92:9,17 92:19 94:8	<b>substantial</b> 22:10,13,21 23:3 32:1 271:8	<b>summarizes</b> 32:25	<b>supplemental</b> 29:8
<b>stuff</b> 50:8 75:25 81:24 90:10 96:18 116:7 121:8,23 123:22 125:9 125:15 127:17 137:23 139:8 165:3,6 182:17 182:19 224:19 270:4	<b>substantially</b> 22:17,18	<b>summarizing</b> 217:4	<b>supplementing</b> 282:13 283:12
<b>stupid</b> 151:14	<b>substantiate</b> 141:4	<b>summary</b> 26:21 32:17,21 33:13	<b>supplied</b> 30:10 85:18
<b>stupidproofing</b> 150:20 151:2 151:13,25	<b>substantiated</b> 246:12	<b>super</b> 24:20 137:10	<b>support</b> 57:9 154:25
		<b>superlatives</b> 164:11 165:13	<b>supporting</b> 98:23 134:12
		<b>supervising</b> 116:17	<b>suppose</b> 51:23 51:24 61:23 69:25 88:24,25 93:20 112:2
		<b>supervision</b> 26:18 127:22 135:3 142:4	

[suppose - talked]

Page 66

128:7 159:17 <b>supposed</b> 53:10 76:8 111:1 112:4 135:21 155:20 274:4 <b>suppression</b> 14:2,14 <b>supreme</b> 98:15 <b>sure</b> 14:7 18:13 19:17 20:6 33:22 35:2 40:25 47:20 48:23 49:23 50:9 51:10 54:16 55:12,19 57:15 58:10 62:11,22 64:14 66:23 67:7 80:6 82:12 85:20 87:12 89:15 91:7,20 91:24 93:1,15 93:23 95:19 96:19 97:12 98:5 101:20 102:9,20 103:3 103:5,12 105:22 106:6 107:17 108:24 109:14 113:4 115:15 119:23 120:2 125:18 128:5 130:2 132:24 135:2,9	135:11,14,17 136:13 139:10 141:20 151:11 156:6,8 158:8 161:9,21 164:6 164:6 165:9,12 165:18 171:17 171:25 172:16 172:17,20 174:12 175:24 177:1 180:12 185:7 189:16 191:17 193:5 199:20 203:11 208:6,9,24 224:16 225:25 232:20 242:6 243:1,2,25 246:9 248:5,9 250:6,20,22 257:8 270:23 275:3 276:9 280:19 282:18 283:14 <b>surprised</b> 33:22 <b>suspect</b> 12:14 130:13 225:20 225:25 <b>suspect's</b> 180:2 <b>suspected</b> 129:4 <b>suspicious</b> 129:20	<b>swat</b> 11:6 13:1 16:15 17:23 37:2 <b>sweden</b> 75:20 <b>sworn</b> 1:18 4:2 37:9 38:18 288:18 290:13 <b>syndrome</b> 118:17,22,25 <b>system</b> 45:25 46:12 47:12 48:5,21 60:14 61:17 85:12 99:3,10,14,25 109:8 168:6 <b>systems</b> 162:25 <b>t</b> <b>tab</b> 178:2 204:16 238:25 239:4 <b>table</b> 97:18 <b>tables</b> 202:10 <b>tactics</b> 37:2 <b>tainted</b> 92:16 <b>take</b> 9:15 10:10 14:23 15:12 35:5 54:1,15 64:4 65:25 72:24 75:2 83:5 102:10 111:17 114:5 118:18 119:15 127:22 141:2	143:18 144:2 146:6,10 149:6 151:15 153:15 154:12 159:13 162:18 186:16 199:1 202:15 205:2 206:11 209:23 213:3 218:14 221:22 226:25 239:15 256:25 284:23 <b>taken</b> 1:18 145:19 289:15 <b>takes</b> 50:7 60:3 144:20 153:3 172:1 <b>talk</b> 7:25 15:13 53:1 57:14 75:6 90:13 100:8 163:3 184:8 243:11 243:15,18 <b>talked</b> 13:19 31:11,23,25 32:5,7 33:10 64:25 68:5 75:10 78:7 79:12 82:4 89:25 90:14 91:14 99:12 100:9,19,24 102:23 103:19 106:16 129:2 130:22 140:15
--	---	---	--

[talked - tend]

Page 67

142:18 256:22	185:16 219:2	134:12,12,12	161:22 177:21
<b>talking</b> 20:25	<b>tasks</b> 110:18	135:14 183:9	181:4,17
23:12 24:9	113:7 219:5,6	<b>tease</b> 168:1,8	183:14 190:6
25:25 26:20,21	<b>taught</b> 161:25	169:13,21	190:20 192:1,4
27:5,7 30:15	163:5 192:23	170:7 171:7,8	195:17 209:16
52:23 55:19	<b>teach</b> 59:23	<b>teasing</b> 168:19	209:23 212:19
58:12 60:13	94:10 108:23	170:14 171:10	213:9 214:17
68:24 70:19	108:25 151:1	<b>tech</b> 35:6	216:7 217:4,12
78:24 85:11	156:25,25	142:24	217:17 224:14
90:9 99:4	157:7 221:12	<b>technique</b>	233:1 235:10
100:18 110:17	<b>teaches</b> 59:24	186:24	244:11 250:11
124:23,25	<b>teaching</b>	<b>techniques</b>	270:18 279:3
127:21 130:12	149:21 152:2	83:25	280:14 282:19
130:22 135:3	157:9	<b>technology</b>	<b>telling</b> 163:16
154:9 159:8	<b>team</b> 39:12,19	138:15 207:6	180:14 198:14
164:10,10	41:17,24 42:11	<b>tell</b> 8:7 9:9,10	<b>tells</b> 55:4
165:13 167:23	42:13,14 43:21	12:8,13 28:7	278:16
170:14 183:13	44:4 45:8,19	41:17 43:8	<b>template</b> 17:1
184:9 191:18	47:7,8,21	44:3 53:7 56:7	<b>ten</b> 9:20 62:19
202:10 220:25	51:20 52:4,16	56:21 59:9	62:23 68:24
237:7,25	60:7 70:24	62:8 69:20	69:13,14 70:3
241:24 248:23	71:13 100:16	76:25 88:1	131:8 132:7
258:18 278:21	101:17 122:5	93:7 97:18	163:18 206:5
<b>talks</b> 243:6	128:25 129:4	101:22 104:12	206:16 207:18
<b>tap</b> 177:20	130:16 132:4	104:25 108:22	231:11 235:16
<b>tape</b> 185:12	135:9 139:6,15	108:23 109:5	235:20 236:11
<b>tapping</b> 50:20	139:21	112:17 118:15	236:13,24
50:20 177:17	<b>team's</b> 71:15	121:17 126:15	238:16,18
192:14 193:3	127:7	129:11 137:1	241:24 248:22
<b>task</b> 58:19	<b>teams</b> 37:1,8	142:19 153:14	275:10 276:23
110:10 111:24	38:21,24 39:10	153:19,23	277:6,25
157:19 171:2	40:14 43:5	154:10,16,20	<b>tend</b> 44:19
181:12 183:11	65:11 119:21	155:19 158:15	76:14 83:2
183:20 185:8	128:20 134:11	160:9,11,20	



**[tends - things]**

Page 68

<b>tends</b> 101:17	277:14,15	271:16 272:10	68:3 71:16
<b>tenth</b> 46:15	<b>testified</b> 4:2	273:9,18	76:7 77:12
<b>term</b> 26:23	13:22 14:8	277:10,16	78:13 83:17
59:4 65:24	<b>testify</b> 7:9	<b>tests</b> 44:24	90:9 113:1
67:6 130:9	170:16	273:2	116:8 119:15
140:16 210:24	<b>testifying</b> 5:23	<b>texas</b> 1:1,9,20	120:10 121:11
<b>terminology</b>	11:15 12:20,23	1:23 2:11,16	123:11 125:22
66:14 243:5	13:19 145:22	2:19,23 261:21	131:25 132:18
<b>termites</b> 75:18	<b>testimony</b>	288:1,9,16	138:5 140:6
<b>terms</b> 54:21	14:17 200:11	289:22,24	144:18 152:19
55:12,13,13	281:18,23	290:2,18	155:8,18
57:15 61:7	285:12 288:19	<b>text</b> 16:9 17:4	175:14 178:21
65:4,19 76:24	291:9,17	147:6 167:5	179:2,24 180:4
79:7,11 84:18	<b>testing</b> 45:6	174:1,3 264:10	180:15 182:21
95:17 99:3	49:18 87:12	<b>th</b> 290:4	183:2 185:18
114:20 119:21	152:20 245:5	<b>thank</b> 6:14 32:3	198:4 210:9
124:20 128:18	245:16,19,19	36:12 45:4	221:7 235:18
128:23 133:11	246:3 251:7,8	107:24 130:19	238:6 241:6
138:19 237:11	252:6 253:12	133:18 144:6	245:17 278:21
237:12 238:16	254:1,2,16	150:4 200:15	279:10 283:15
238:16 251:7	255:19 256:1	214:22 222:9	<b>things</b> 15:15
277:10 282:1	256:13 257:20	240:6,11	24:17 33:5
<b>terribly</b> 224:10	258:7,16 259:3	273:20 276:6	37:15 48:19
233:6	259:13,24	280:4	51:1 53:11,13
<b>terrier</b> 81:4	260:6,18 261:8	<b>thanks</b> 35:8	54:22 55:5
<b>test</b> 63:24 64:3	262:12,20,21	46:14 162:7	59:13 60:14,19
65:13 68:12,14	262:21,22	214:14 222:13	61:2 80:18,19
241:16 245:12	263:19 264:21	<b>thc</b> 79:1	81:24 86:9,16
245:15 252:17	265:4,14,23	<b>theory</b> 98:10	87:3 94:15
252:22 255:7	266:8,16 267:7	137:18 163:15	99:12 100:20
272:18,19	267:14,22	<b>thing</b> 7:6 34:20	100:23 102:11
<b>tested</b> 132:4	268:4,14,25	44:1 52:10	103:7,10,13
163:23 245:10	269:7,14	57:19 58:8,11	122:12,19
252:7 277:13	270:12 271:9	58:23 59:14,25	125:17 127:15

[things - time]

Page 69

128:11 131:24	102:22 104:24	237:24 239:1,5	156:8 203:10
137:9,11	107:18 109:17	239:7 240:5	210:14 213:19
138:23 140:5	111:3 115:20	243:10 245:9	215:4 219:18
140:23 142:25	115:25 116:14	249:10 257:12	220:9 223:8
144:6,13,14,15	116:15 119:23	269:19 271:8	225:22 230:18
150:8 151:1	121:12,17	275:19 277:11	231:10 254:25
159:24 160:8	125:2,4,8	277:20 278:13	275:17,22
161:15 163:4	126:7 128:9	279:16 280:14	276:22 277:4,4
175:19 177:8	134:17 135:16	281:4 284:24	277:12
177:20 189:17	138:21,22	285:15	<b>threshold</b>
195:18 211:10	139:6,22 140:2	<b>thinking</b>	41:23 61:18
211:25 212:5	140:20 142:21	110:15 158:12	63:22 129:2
224:4,9 225:3	143:3 144:9	169:10 220:13	<b>thresholds</b>
278:13,22	145:15 151:8	<b>thinks</b> 87:6	141:15
<b>think</b> 7:4 9:23	152:1 156:2	116:12 195:9	<b>throckmorton</b>
11:8 15:22	157:2 159:16	<b>thoroughly</b>	289:23 290:18
18:23 20:5	162:4,24	22:23	<b>throw</b> 111:22
22:1 23:4 24:1	166:11 170:25	<b>thought</b> 19:2	<b>thumb</b> 125:13
24:8 29:9,14	172:3 175:11	24:13 67:9	<b>thumbed</b>
31:1,15 32:6	177:6,7,10	77:10 127:21	123:24
32:13,25 35:22	180:1 181:3	137:4 141:15	<b>thunder</b> 53:5
36:6,6,18 41:5	182:14,15	143:12 183:14	<b>ticket</b> 262:1
41:10 45:2	183:12,18	186:13 200:11	<b>tie</b> 83:6
47:17 49:2	185:12,20,23	216:13 249:16	<b>time</b> 12:24
52:17 54:8	188:14,22	<b>thousands</b>	24:17 31:4
55:9 56:12	193:8 197:22	24:21,21	34:15,21 38:6
57:5 60:24	198:15,16	<b>thread</b> 128:21	38:10 42:21,25
64:9,12 71:8	199:16,19,20	<b>three</b> 11:9,10	43:1 44:10
73:11 78:25	200:10 201:12	14:9 31:5	47:6 53:14
84:14 90:14	201:24 212:4	39:24 46:11	54:7 55:15,18
94:1,17,18	212:20 215:20	47:9 60:15	57:4 59:21,25
95:10,23 99:13	216:6,7 217:12	62:19,23 77:17	60:8 62:4 63:2
100:6 101:14	219:12 221:15	77:21 105:7,9	63:6,8,9 64:5
101:23 102:17	223:7 227:3	105:12,17	69:16 70:3,24

[time - trace]

Page 70

82:20 83:3	<b>timeline</b> 55:2	<b>today's</b> 7:13	<b>towel</b> 83:9
86:22 98:16,19	55:20,22 133:1	<b>together</b> 30:19	<b>toy</b> 65:23
100:9 101:18	134:6	52:8 86:3	108:21,22
106:16 114:7	<b>times</b> 5:16	132:4,5 183:9	109:2,3,6,11
114:11 115:3	10:21 13:25	207:17	110:18,19,19
115:16 121:2	42:16 58:24	<b>token</b> 202:6	164:18 168:1
123:5 125:8,13	70:22 136:12	<b>told</b> 49:15	168:20 169:21
125:15 127:8	141:3 155:5	111:6 153:4,22	170:1,7,25
133:21 140:24	157:15 164:1	183:14 200:12	171:7,9 172:8
143:21 144:2	164:23,24	<b>tongue</b> 43:19	172:11,12,13
144:19 159:14	166:12,17	<b>took</b> 10:11	197:17,20
163:11,13	179:2 182:22	53:19 159:13	<b>toys</b> 57:11,23
165:1 167:18	211:25 276:3,5	<b>tool</b> 147:12	108:20 111:2
169:18 180:24	276:6,18,21,22	166:5	167:25 168:7,8
180:25 182:1	276:25 277:13	<b>top</b> 207:9	169:12,13
185:6 188:21	<b>timestamps</b>	224:16 249:3	170:15 171:12
192:6 194:13	24:17	274:21	<b>trace</b> 193:25
198:5 204:18	<b>tire</b> 102:10	<b>topic</b> 128:23	197:2 198:6,9
209:1,1,6,7	192:15	<b>toss</b> 121:23	241:13 245:3
213:3,11,22	<b>tired</b> 7:5	<b>tossed</b> 219:3	251:7,25 253:9
214:25,25	<b>title</b> 5:2,3,5	<b>total</b> 9:23 69:4	253:22 254:13
218:14 222:6,7	26:25 73:12	207:12 235:13	254:25 255:3,5
223:4 224:6,22	142:19,21	235:14,19,23	255:14 256:6
226:25 238:7	<b>today</b> 4:9,18	282:6,9	257:10,12,13
247:21 265:9	5:2,6 6:15 7:9	<b>totally</b> 10:8	258:4,14 259:1
275:2,12	8:1 17:16	52:20 111:18	259:11,21
276:12,13	18:13 19:19,21	161:1 170:12	260:4,16 261:7
278:17,20	44:17 75:6	182:8 221:10	262:18 263:9
291:18	90:15 112:5	275:21	263:13,16,18
<b>timeframe</b>	115:19 119:4	<b>towards</b> 60:22	265:22 266:5
291:8	122:2 163:2	151:6,20	266:18 267:5
<b>timeframes</b>	200:21 204:10	181:24 186:2	267:14,20
100:19	224:24 282:12	<b>towed</b> 66:24	268:2,11,22,22
	283:18,22		269:5,12,20

[trace - transcript]

Page 71

270:5,10,18	119:1 130:24	100:18 102:15	176:16 177:15
271:7,14,23	132:5,20	103:14,18,24	180:11 184:8
272:6,7,15,25	159:18 163:23	104:11,13,21	191:15 198:23
273:7,16 277:3	198:20	104:24 105:2	199:1 203:6
277:7	<b>trainer</b> 53:20	105:17 106:9	205:8,13
<b>traces</b> 252:2	115:10 135:24	106:14,24	206:20,22
<b>track</b> 111:24	136:16 137:21	108:2,2,3,6,9	208:4,20 209:3
113:25 135:20	138:25 139:2	112:1,8,17	209:4,12,22
140:25	141:20 226:18	113:2 117:18	210:3,14
<b>tracking</b> 107:5	226:19 238:1	118:5,18,20,23	211:19 212:17
111:15,16,21	<b>training</b> 3:12	119:3,3,4,4,6	212:22 214:21
158:7	21:6 28:7,22	119:10,14	218:22 219:5,6
<b>traffic</b> 20:2	29:3 32:10,14	120:19 121:8,9	222:14 224:23
24:18 126:1	32:22 33:25	121:14 126:16	226:10,17
131:18 281:3,5	36:25,25 37:1	127:18,19	230:16 235:13
281:15,18,23	37:7,7 38:3	128:10,12	235:15,20
<b>trail</b> 111:17	40:2 43:9 47:2	129:23 134:3	236:4,7,12,24
<b>trailer</b> 12:17	47:15,17 48:2	134:13,13	237:8 238:1,17
<b>train</b> 43:1 47:6	48:3 54:2 56:3	136:15 138:3,6	239:25 250:18
66:25 81:17	61:11,24 66:6	138:12,22,22	250:20 278:4
82:22 88:9	66:17,18,20,20	138:24 139:5	278:10,18
97:20 98:2,6	66:21 67:15,16	139:12 140:3	279:9 281:6
103:15,17	68:3 70:19	140:13 141:10	<b>trainings</b> 36:2
108:10 118:15	71:15,23 72:5	142:16,20	42:7 112:3
150:1 163:24	72:6,7,13,13,14	145:16 149:15	212:24 213:6
171:15 211:2	72:15,20,21,23	149:15,17	213:10 225:6
<b>trained</b> 38:21	73:5,6,16,18	150:12,25	226:12 234:9
38:25 56:8	74:16,20,23	153:10,10	281:7
58:13 66:2,22	79:11 81:12,12	164:5 167:16	<b>transcript</b>
68:13 76:3	83:13 88:25	167:22 168:3	29:23 30:1
77:15,20 79:17	91:23 92:1,20	168:21,22,23	31:20 283:1,4
88:6 90:22	93:11,20,23	168:24 169:3,6	288:18 289:7
96:24 98:7,15	97:2 99:3,8,14	169:14 171:1	290:6 291:6,19
110:16 118:23	100:5,7,8,10,15	175:18 176:8	

[transcripts - under]

Page 72

<b>transcripts</b> 29:19 <b>translate</b> 95:24 <b>travis</b> 290:1 <b>treat</b> 41:4 64:20 75:8 196:1 <b>tremendous</b> 54:20 <b>trend</b> 98:25 <b>trial</b> 12:9 <b>trick</b> 90:1 <b>tricky</b> 92:5 <b>tried</b> 192:3 <b>tries</b> 147:9 181:20 <b>trip</b> 151:6 <b>trouble</b> 175:21 <b>truck</b> 192:4 <b>true</b> 93:19 112:20 287:3 288:19 <b>trump</b> 78:15 <b>trust</b> 235:8 <b>truth</b> 198:14 <b>truthfully</b> 7:9 <b>try</b> 6:7,11,22 34:6 35:18 41:7,10 54:2 54:15 66:5,6 66:12 67:22 81:20 96:2 103:4 131:19 146:6 156:9,14	172:24 179:5 181:17 185:22 186:15 189:20 189:25 190:15 192:24 193:3 195:16 207:2 243:22 245:12 247:20 255:6 281:15 <b>trying</b> 19:13 33:21 34:18 35:1 47:7 58:2 61:19 64:21 66:1 69:9 81:22 90:1 95:14 97:13 100:1 114:4,17 122:18 131:22 182:5 184:1,2 188:14 192:6 192:18,22 194:11 199:20 212:24 220:14 223:21 224:8 228:22 244:2 252:21 277:11 278:18,19,19 281:16 <b>tug</b> 83:8 154:14 171:14 <b>turn</b> 15:21 18:7 19:24 21:19 150:5 175:20 281:15	<b>turnaround</b> 56:7 <b>turns</b> 175:2 <b>tv</b> 155:21 <b>tweak</b> 90:7 <b>twice</b> 68:16 281:11 <b>twister</b> 43:19 <b>two</b> 25:13 28:16 31:16 39:2,9 47:10 62:14 68:11 69:4,12,13 70:3,6 101:12 116:4 121:3 123:7 156:8,9 159:24 179:9 195:1 203:10 210:13 213:18 215:4 216:6 220:9 225:23 229:3,8 231:10 231:24 234:17 256:21 270:18 271:6 275:17 275:22 276:22 277:4,4,12 <b>type</b> 98:1 <b>types</b> 36:2 72:22 73:19 140:10	<b>u</b> <b>u.s.</b> 62:14 195:25 <b>uh</b> 29:10 59:7 61:1 63:25 75:14 81:3 100:11 121:22 204:24 246:14 <b>ultimately</b> 13:10 58:25 59:13 99:25 186:24 <b>umbrella</b> 98:22 <b>un</b> 98:6 <b>unable</b> 155:4 <b>unassigned</b> 90:18 91:8 256:21,22 257:6 <b>unclear</b> 6:21 31:16 67:4 <b>uncomfortable</b> 19:4 <b>uncommon</b> 82:6,7 93:25 195:16 272:3 <b>under</b> 5:23 16:6 21:3,19 23:2 26:6 35:16 38:2 70:13 74:11 92:22 98:1,22 125:13 128:16
--	--	--	--

[under - used]

Page 73

134:24 142:3	25:17 29:2	57:10 58:11,16	130:13 140:19
149:9 173:23	41:19 49:23	102:24 103:13	140:22
187:22 199:5	55:13 78:23,25	<b>unintentionally</b>	<b>unsubstantiat...</b>
209:22 247:18	110:9 117:13	50:10	129:20
270:25 285:2,6	142:9 156:1	<b>unit</b> 84:20	<b>unusual</b> 76:18
287:10,17	162:21 170:4	93:22 114:22	137:7 180:4
<b>underlying</b>	170:13 196:6	115:4,9 116:5	182:20 188:12
16:15	200:11 218:13	116:11,17	261:23 279:2
<b>underneath</b>	218:23	117:7,9,11	<b>upper</b> 51:7
12:17	<b>understands</b>	118:4 120:5	201:23,24
<b>underscores</b>	155:19 171:16	124:25 125:2	<b>upward</b> 159:19
22:9	<b>understood</b>	126:5,7,11	181:23
<b>understand</b>	21:2 67:7	127:21 128:1	<b>use</b> 5:6 16:12
5:25 8:25 14:7	135:2 170:15	128:18 130:11	17:1 44:19
16:25 19:13	182:8 280:4	131:2 135:3,4	46:12 47:1
22:15 33:21	284:7	136:23 137:14	48:5 62:13
34:20 35:15	<b>undirected</b>	137:21 138:18	64:6 65:2,4
40:25 47:11	195:5	139:11 140:24	66:9,20 68:6
50:16 86:4	<b>unfocused</b>	141:24 142:2,9	91:12 110:12
99:9 102:3	187:12	142:12,13	113:22 125:8
107:25 116:24	<b>unfortunately</b>	226:8,11 257:8	129:17 130:9
117:14,17,18	50:24 67:1	<b>united</b> 1:1	130:24 139:18
138:3 152:4	117:3 120:21	142:7 288:1	148:12 154:12
155:4,17	121:6 132:18	<b>units</b> 140:1	158:16 195:14
167:15 169:13	189:6	269:17 270:1	204:10 207:23
174:9 177:1	<b>uniform</b> 279:8	<b>university</b> 73:6	210:24 211:6
180:6 184:20	<b>unimportant</b>	73:9 94:9	236:14 241:4
221:10,13	121:1,18	<b>unknown</b> 95:22	245:14
226:13 227:11	<b>uninitiated</b>	96:13	<b>used</b> 12:17
238:15 243:10	155:18	<b>unpack</b> 56:16	26:23 55:11,21
244:15 246:14	<b>unintentional</b>	147:20 153:8	61:7 64:10
246:20 250:25	52:21,24 54:4	<b>unsafe</b> 102:8	67:6 108:20
<b>understanding</b>	54:6,12 55:14	<b>unsubstantiat...</b>	161:19 204:11
5:19 8:13	56:14,17,22	129:16 130:9	215:15 218:10

[used - want]

Page 74

224:7 233:3 236:2 264:11 291:19 <b>useful</b> 122:4,15 122:21 <b>uses</b> 46:2 54:21 76:14 117:19 241:3 243:5 <b>using</b> 57:15 66:14 107:12 107:13 109:8 136:20 239:5 242:21 243:2,9 263:23 270:24 <b>usually</b> 82:14 111:18 137:7 145:6 172:10 233:2 255:5 270:4 278:21 <b>utah</b> 39:8,15 44:19,22 63:19 92:22,24 94:24 <b>utilize</b> 45:25 67:18 122:12 <b>utilized</b> 12:14 284:3,5 <b>utilizing</b> 241:1	<b>value</b> 93:12 139:23,25 140:12 <b>variable</b> 55:5 59:6 81:13 162:25 <b>variety</b> 45:6,7 80:18 <b>various</b> 72:12 72:22 <b>vary</b> 42:1 <b>vast</b> 176:7 <b>vega's</b> 16:15 <b>vehicle</b> 25:14 30:24 60:4 113:17 137:6 164:20 180:2 185:19 194:1 195:4,15 206:7 261:14 <b>vehicles</b> 93:21 140:8 182:19 225:22 281:13 <b>vendor</b> 72:19 84:5,19 85:2,9 <b>venues</b> 140:11 140:12 <b>verbally</b> 50:2 <b>verify</b> 291:9 <b>veritext</b> 289:23 290:17 291:14 291:23 <b>veritext.com</b> 291:15	<b>version</b> 17:7 155:21 <b>versus</b> 112:5,16 112:18 128:12 160:16 195:25 239:24 <b>video</b> 6:17,17 30:19,20,22,23 30:25 31:3,4 72:6,14,18 73:10 147:2,4 147:7,17 156:11,17,19 156:23 167:3,5 174:3,11,13,14 175:10 178:4,7 178:8,19 179:9 179:14 180:17 181:15 184:21 185:24 187:15 188:4,25 190:1 190:7,17 191:23 192:13 192:20 193:10 193:19 194:5 194:20 196:19 196:20,23 197:9 <b>videos</b> 23:15,23 24:4 25:6,8,10 25:15 30:21 31:6 71:19,21 71:22,23,24,24 135:5 143:10	147:8 173:12 173:13 <b>view</b> 48:5 94:23 108:8 138:18 160:25 163:21 166:12 189:6 233:9 261:1 <b>violation</b> 77:19 <b>virginia</b> 2:5 <b>visibly</b> 169:21 <b>vocabulary</b> 24:15 54:21,24 54:24,25 55:20 56:17 57:6 75:11 132:14 132:15 241:1,5 <b>vocal</b> 118:16 <b>voice</b> 220:13
<b>v</b>			<b>w</b>
<b>v</b> 1:4 288:4 291:4 <b>vague</b> 280:3 <b>valley</b> 12:15			<b>w</b> 2:17 <b>wait</b> 262:20 <b>waiting</b> 96:17 <b>walk</b> 11:13 26:19 208:16 244:14 <b>walking</b> 171:5 189:16 <b>wall</b> 215:14 <b>wander</b> 181:21 <b>wandering</b> 184:25 <b>want</b> 5:5 6:18 14:7 16:9 20:6



[want - ways]

Page 75

22:15 43:5	185:2,3,7	<b>wants</b> 184:14	112:16 115:4
45:23 46:22	189:16,17	187:7	130:10 132:19
47:11 50:15,15	190:10,14	<b>war</b> 83:8	134:16 138:17
51:7 52:15,25	195:16 197:5	<b>warrant</b> 196:4	139:5 148:23
55:12 56:16	198:25 204:14	<b>warrants</b> 20:2	151:22 152:1
57:15 64:24	207:17,23	<b>wash</b> 92:12	154:13 156:3
65:16 71:6,14	208:6,8,15,24	<b>watch</b> 147:2	157:21 158:21
79:8 81:7	209:17 210:7	157:15 174:2	161:14 162:1
82:14 83:6	210:24 211:6	178:16,20	162:16,17
87:18 88:4,9	212:14 221:20	180:16 181:13	163:9,9,9,10,17
90:15 91:19,24	238:9 241:23	187:11 190:10	163:17,21
91:25 94:21	242:5 244:6	197:5	165:15 170:4
96:6,13,20	245:14,23	<b>watched</b> 132:9	170:13 171:16
97:11 98:20	247:9 248:8	156:18 178:20	171:19,20
99:5,7 114:21	249:7 250:9	178:22 179:1,6	175:7 177:16
115:1 122:25	264:11 274:13	179:9,16	180:19,20,20
127:23 137:16	276:10 280:5,9	181:16 185:25	181:3 185:5,6
138:9 140:17	282:17 283:7	187:16 189:1	187:21,23
147:2 151:8,9	285:6	191:7 193:11	193:7 195:18
151:15,17,19	<b>wanted</b> 7:22	194:7	199:16 201:14
151:21 153:20	16:19,24 18:25	<b>watching</b> 53:24	203:4 218:8
153:23 154:10	21:11 36:13,14	133:19 194:14	223:4,21 226:3
154:16,17,20	65:18 67:7	<b>way</b> 5:13,20	226:6 228:23
155:2 156:6,14	75:1 97:20	6:22 18:23	233:13 238:4
158:15 162:21	104:3 135:1	20:24 26:15	241:25 242:21
163:2 164:13	142:15 146:24	33:9,24 35:18	246:2,13 249:1
165:25 166:24	147:16 150:8	42:17 49:13	254:8 255:9
167:18 168:2,3	162:6 173:12	59:23 62:12	262:5 278:15
168:9,12,15	174:1 187:24	64:9 65:4 80:9	279:18 283:5
169:5,6,11	201:19 211:2	84:15 85:17	<b>ways</b> 31:17
171:22 172:13	237:17 278:3	91:6,18 96:22	38:15 42:20
175:1,6 177:1	282:9 284:21	97:4 98:6 99:9	62:14 64:12
177:2,5,6	<b>wanting</b> 170:10	99:20 103:4	102:24 137:1
179:8 183:5		107:15 109:9	149:1 191:18

## [we've - work]

Page 76

<b>we've</b> 30:15 40:17 52:23 58:11 65:21 90:14 92:2 95:8 99:3,12 101:14,14 102:23 110:17 128:13 130:12 241:24 248:22 250:7 260:9,10 275:11 276:22	<b>went</b> 9:9 43:20 98:17,18 123:1 123:3,21 124:15 137:5 144:9 187:6 188:8 213:14 225:5,12 226:14 235:5 278:3 279:22 282:2	204:16,21,24 205:1 208:1,3 214:16,17 221:10,22,24 235:1,5 239:4 239:14 247:14 247:17,23 248:4,10,15,20 256:25 257:4,6 266:24 273:21 273:25 274:6,9 274:10,19,22 275:21,22 279:15,21 285:1,15,21	188:5 195:23 195:25 208:2 221:2 286:2 288:17,20,24 290:3,4,7,9,10 290:11 291:8 291:10,12,18
<b>wearing</b> 54:7	<b>western</b> 1:1 288:1	<b>window</b> 187:21 194:14	<b>witnessed</b> 11:7
<b>web</b> 73:12	<b>wheel</b> 177:17 186:2 187:22 188:1,8,9	<b>wisconsin</b> 14:4	<b>wolf</b> 186:17
<b>website</b> 143:24 143:25 146:14 146:20	<b>white</b> 40:23,24 83:5,8	<b>wish</b> 121:23 190:19,19 224:14	<b>wonder</b> 220:13
<b>weeds</b> 52:25 90:8	<b>whoops</b> 275:17	<b>withhold</b> 88:22 88:23 89:8 99:6	<b>wonderful</b> 51:5 121:2
<b>week</b> 38:8 44:17 100:13 105:2,8,9,13,18 105:20,20,23 106:9 107:22 127:17 137:3 137:16 236:19 236:23	<b>wifi</b> 173:17	<b>witness</b> 1:17 3:6 13:13 37:17,20 91:1 91:3 104:10 152:10 174:14 174:19 186:7 186:10,12,15	<b>wondering</b> 32:18 84:21 101:20 179:24 184:12 187:12
<b>weekly</b> 36:25 37:7 38:3,7 42:7 209:3	<b>willing</b> 261:25	<b>withholding</b> 89:13	<b>wood</b> 41:9
<b>weeks</b> 121:3	<b>windham</b> 2:3 3:5 4:4,7 15:3 15:7,10 35:5 35:11,14 37:21 70:11 72:9,11 74:9 91:6 103:2 104:12 114:3,7,11,14 114:18,20 128:15 134:22 152:12 173:19 173:22 177:25 178:6 188:7 196:4 199:4	<b>woodrow</b> 16:15	<b>word</b> 49:14 80:6 129:17 146:25 147:1 151:25 152:1 186:9,14 211:6 222:6,7
<b>weight</b> 255:13 255:13 257:11			<b>words</b> 124:11 131:21 136:21 140:17 144:21 154:12 192:24 212:14
<b>welcome</b> 90:7 211:7 280:10			<b>work</b> 5:20 23:21 38:13 40:18 42:3,4 43:18 60:22 65:17 66:2,25

[work - yeah]

Page 77

67:3 90:3	<b>workshops</b>	129:22 130:9	103:5 105:10
91:10,19 94:16	38:16	131:24 149:12	105:19,25
98:9,11 105:10	<b>world</b> 42:17	152:19,22	108:19 109:18
107:1,6 108:4	66:16,25 67:14	154:3,4,17	109:23 110:6
109:1,1,2	68:2 81:8	172:25 174:23	112:19 114:3
114:18 116:1	129:7,8 194:23	179:7 183:15	114:14,16,18
130:15 131:12	195:2,3	200:22 212:20	115:6 118:17
137:7 142:24	<b>worn</b> 30:17,19	238:5 239:6	120:7 122:25
148:4 151:20	30:20 128:6	247:2 250:11	126:7 129:19
156:5 162:19	<b>worries</b> 114:16	<b>wrote</b> 10:9	134:10 135:19
172:22 183:2	<b>worse</b> 51:6	29:22 199:24	139:13 141:2
184:13 185:5,6	<b>worth</b> 25:13	202:9 218:13	146:6,16,19,21
185:9 186:22	263:14,14	279:11	147:5 149:1
186:23 187:2	289:24 290:18	<b>x</b>	154:24 155:6
195:6 207:4	<b>wright</b> 1:20	<b>x</b> 2:20 289:3	156:6 158:19
211:17 225:14	2:15 288:14	<b>y</b>	161:13 162:9
226:2 228:22	289:22	<b>yeah</b> 8:21 9:23	164:19,25
246:11	<b>write</b> 8:8,19	9:24 10:6,25	165:14 170:2,3
<b>worked</b> 23:18	236:17 279:8	11:4 13:2,6,14	170:18 172:18
23:19 68:15	284:13	13:16 16:21	175:5 176:9
75:22 77:15	<b>writing</b> 7:20	17:14 19:13	177:5,19
106:3	8:7 9:9,12 10:8	33:4 34:3 35:9	180:25 184:23
<b>working</b> 26:16	24:10 31:19	37:19 50:20	185:2 189:8,24
34:9,21 60:23	32:1 33:16	54:19 56:20	190:12 192:16
98:22 106:2	34:1 36:9 47:3	57:13,24 58:23	195:1 196:16
107:6 142:4	48:19 217:18	61:22 62:24	201:16 203:15
182:6,13 183:9	217:19,19	65:12,12 67:2	208:23,24
224:18	243:15 250:14	69:8 70:7	210:4 213:23
<b>workings</b> 118:9	<b>written</b> 35:20	76:21 80:15	214:20,22
<b>works</b> 45:13	74:5,14	81:22 82:1	216:11,21
98:9 99:10	<b>wrong</b> 32:6	84:9 86:7 87:1	217:21 221:19
100:1 101:21	41:18 67:4,20	87:2 90:6 92:9	222:5,21
108:22 110:9	77:1 99:13	92:14 97:12,15	224:20 225:4
130:22 186:25	105:1 125:22		230:7 231:8,9

**[yeah - zoom]**

Page 78

232:20 237:10
239:22,22
240:24 241:2
242:3 245:6
247:1,14 248:3
250:4,22
257:17 264:13
265:5 271:6
272:19 274:8
276:16 277:18
277:23 280:9
<b>year</b> 11:1,4
28:15,16 39:14
102:1 121:21
122:1
<b>years</b> 11:24
25:13 33:20
37:5,10 39:23
77:17,17,21
95:9 122:24
123:7 203:10
203:10
<b>yep</b> 204:21
242:8
<b>yesterday</b>
29:21 31:11
<b>z</b>
<b>zero</b> 45:12
<b>zoom</b> 2:14

Texas Rules of Civil Procedure  
Part II, Section 9, Evidence and Discovery  
Rule 203

203.1 Signature and Changes.

(a) Deposition transcript to be provided to witness. The deposition officer must provide the original deposition transcript to the witness for examination and signature. If the witness is represented by an attorney at the deposition, the deposition officer must provide the transcript to the attorney instead of the witness.

(b) Changes by witness; signature. The witness may change responses as reflected in the deposition transcript by indicating the desired changes, in writing, on a separate sheet of paper, together with a statement of the reasons for making the changes. No erasures or obliterations of any kind may be made to the original deposition transcript. The witness must then sign the transcript under oath and return it to the deposition officer. If the witness does not return the transcript to the deposition officer within 20 days of the date the transcript was provided to the witness or the

witness's attorney, the witness may be deemed to have waived the right to make the changes.

(c) Exceptions. The requirements of presentation and signature under this subdivision do not apply:

(1) if the witness and all parties waive the signature requirement;

(2) to depositions on written questions; or

(3) to non-stenographic recordings of oral depositions.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored



in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).